

# **North Wales Border Control Post**

Habitat Regulations Assessment - Report to  
Inform Appropriate Assessment  
BCP21-007-00-00

September 2021



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# 1 Introduction

## 1.1 Background

Mott MacDonald Limited was appointed by Welsh Government to undertake a Habitat Regulations Assessment (HRA) of Plot 9 Parc Cybi, Holyhead, Anglesey to inform future development at the proposed site as a Border Control Post (BCP).

A HRA Screening Report was produced by Richards, Moorehead and Laing Limited (RML) in December 2020, to inform planning for a Heavy Goods Vehicle (HGV) stacking facility at Plot 9, Parc Cybi, which took place under an emergency order. The report concluded that the proposal was unlikely to cause significant adverse effects to the designated sites or their features of interest, taking into consideration their conservation objectives.

## 1.2 The Site

The site is approximately 6.4ha, located to the south-east of Holyhead town centre (grid reference SH 25705 80439) and is currently in use as an emergency HGV stacking facility with ancillary staff welfare facilities. There is one existing attenuation pond, and an additional attenuation pond under construction at the time of the Phase 1 Walkover Survey (March 2021). The site lies within the Parc Cybi 'enterprise zone' and can be accessed via the Parc Cybi spine road. The wider site comprises grazed grassland and marshy/rush pasture with scrub, woodland and rocky outcrops. The A55 runs north-east of the site and residential properties lie to the south-west. An existing truck stop is located approximately 300m west of Plot 9 within Parc Cybi.

The north-eastern portion of the site (adjacent to the Parc Cybi spine road) was investigated by archaeological excavation during the development of Parc Cybi. Hardstanding and bare ground constitute the majority of the site footprint. An extensive soil strip was undertaken to facilitate archaeological and ground investigations, as part of its current use as an emergency stacking facility (consented under a separate process). Habitat of ecological value ranging from medium to high value is limited to the peripheral margins of the site.

The scheme design and planning approach is set out within the Planning Statement (2021)<sup>1</sup>.

## 1.3 Purpose of this Report

This HRA report has been prepared to document the assessment of the potential for effects of the proposed BCP development on European Sites, as required by Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 2017 Regulations). The process followed is described in Section 2 and in Appendix A.

A summary of the qualifications of the persons responsible for producing this report is provided in Table 1.1.

**Table 1.1: Ecologist Qualifications**

Name and Role	Qualifications	Experience
Anna Owen Originator	BSc (Hons), ACIEEM	Graduate Zoologist with over 5 years' ecology experience.
Alex Wilson Checker	BSc (Hons) PhD, MCIEEM, FLS	Over 16 years' experience in ecology within academic, non-governmental body and consultancy. Specialism in bat and bird ecology. Advising on protected species and habitats in relation to legislation, licensing and impact assessment.

<sup>1</sup> Mott MacDonald (2021) North Wales Border Control Post Planning Report. September 2021

Name and Role	Qualifications	Experience
Joanne Bates Approver	BSc (Hons), MCIEEM, CEnv	Over 20 years in ecological consultancy and has undertaken HRAs for shadow assessments to inform HRA and acted on behalf of the competent authority to review other consultants' reports.

Source: Mott MacDonald Limited, 2021

## 2 HRA Framework and Consultation

### 2.1 HRA Framework

National Site Network (formerly known as European or Natura 2000) sites form a network of protected sites, designated for their rare, vulnerable and/or endangered species and habitats. National Site Network sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). An assessment of the potential impacts of the plan or project must also be undertaken where the plan or project may cause an effect upon potential SPAs (pSPA), candidate SACs (cSAC) and listed and proposed Wetlands of International Importance (Ramsar sites and pRamsar sites) for the purposes of considering plans and projects<sup>2</sup>. Hereafter, all the above National Site Network sites are referred to as 'European Sites.'

Part 6 of the Conservation of Species and Habitats Regulations 2017 (as amended) transpose the requirements of Article 6 paragraphs (3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive) into UK law. These Regulations require that the competent authority undertakes an appropriate assessment of implications of a project on a European Site, where this is likely to have a significant effect on any sites under that designation.

The regulations also require a person, or organisation, applying for a consent to undertake an activity to provide the competent authority with sufficient information to inform its assessment. This process of assessment comprises the HRA.

The HRA process consists of four stages as summarised within Table 2.1.

**Table 2.1: HRA Stages**

Stage	Description
Screening (Stage One)	This is the process which identifies the potential effects upon the European sites and considers if the effects are likely to be significant. A significant effect or impact on a European site is that which could undermine the conservation objectives or/and management of the site. The likelihood of it occurring is judged on a case-by-case basis, taking account of the precautionary principle and the local circumstances of the site. The judgment of 'likelihood' is, in turn conducted in a very precautionary manner, taking account of the ecological circumstances of the European site. This is an iterative process and before moving to Stage Two it can be repeated if required. Proposals to mitigate any significant effects are not considered at the screening stage. The competent authority must consult with the appropriate nature conservation body (in this case Natural England and subsequently the Local Planning Authority) and have regard to any representations made by that body.
Appropriate Assessment (Stage Two)	If the Stage One Screening identifies that the project or plan, alone or in combination, may have significant effects on a European site, or if there is uncertainty, the competent authority must undertake a 'Appropriate Assessment' (Stage Two) of the implications for that site in view of that site's conservation objectives. This step involves the consideration of the predicted adverse effects of the project or plan either alone or in combination with other projects or plans, on the integrity of the European site with respect to the site's structure and function and conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts is also required.
Assessment of Alternative Solutions (Stage Three)	If the mitigation measures prescribed at Stage Two cannot avoid adverse effects on the integrity of a European site, this process examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site.

<sup>2</sup> Communities and Local Government (2019) National Planning Policy Framework [online] available at: [Title \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

Stage	Description
Assessment where no alternative solutions exist and where adverse impacts remain (Stage Four)	If no suitable alternative solutions are available, Stage Four requires an assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest ("IROPI"), it is deemed that the project or plan should proceed. In making this assessment, it is important to recognise that it will be appropriate to the likely scale, importance and impact of the proposed project. A key outcome of the Appropriate Assessment is to identify whether the integrity of the European site(s) is likely to be adversely affected by the plan/project and whether the conservation status of the primary interest features of the site could be impacted. If it is impossible to avoid or mitigate the adverse impact, it must be demonstrated that there is IROPI. This is a last resort and should be avoided if possible.

Each stage determines whether further stages in the process are required.

If the conclusion of Stage 1 is that there will be no significant effects on a European Site, there is no requirement to undertake further stages.

All the Stages of the HRA process, including those beyond Appropriate Assessment are shown in Appendix A.

This report comprises Stage 1 – Screening of likely significant effects of the proposed development and Stage 2 – Appropriate Assessment.

## 2.2 HRA Consultation

To date, there has been no detailed consultation with Natural Resource Wales (NRW) as the relevant statutory nature conservation body (SNCB), with specific regard to HRA and the proposed development.

## 3 Methodology

All available information about the proposed development was gathered in order to assess whether it is considered likely to have significant adverse effects on any features of a European site or have an adverse effect on the integrity of that site.

### 3.1 Assessing Potential Impacts

The aim of the HRA Screening process is to determine whether the proposed development is likely to have a significant effect on any features of a European site and, therefore, if an Appropriate Assessment is required. This Screening process should not consider mitigation measures adopted into the design of the Site<sup>3</sup>. The concept of 'likely significant effect' as embodied in Article 6(3) of the Habitats Directive and Regulation 61(1) of the Habitats Regulations is central to their operation. Its interpretation is well established in law and guidance and embraces the precautionary principle.

Whether the proposed development has the potential to have a significant effect on a European Site depends on the occurrence of:

- any potential impact pathways;
- land take and habitat removal for the works;
- a risk of altering the hydrodynamic regime;
- a risk of an increase in air, noise and light pollution;
- a risk of a reduction in water quality; or,
- physical disturbance to international designated sites and/or their designated interest features.

Determination of whether there will be an impact from the proposed development on a European site will be determined using professional judgement using the best readily available information. This information can include evidence from previous similar projects that have impacted European sites and ecological survey information gathered.

### 3.2 Determination of European Sites included within the HRA

With regards to determining the European sites to include in the Screening assessment ('Scoping'), the DMRB guidance<sup>4</sup> provides a suitable framework for determining the potential Zone of Influence for a project:

1. is the project within 2km of a European site or functionally linked land;
2. is the project within 30km of a SAC where bats are a qualifying feature;
3. does the project cross or lay adjacent to, upstream of, or downstream of, a watercourse which is designated as a European Site; or,
4. does the project have a potential hydrological or hydrogeological linkage to a European site containing a groundwater dependent terrestrial ecosystem (GWDTE).

In addition, paragraph 3.7.2 states that additional European sites should be subject to screening where other forms of ecological connectivity exist between them and the proposed development.

<sup>3</sup> People Over Wind (Peter Sweetman v Coillte Teoranta, Case C-323/17)

<sup>4</sup> Highways England (2020) DMRB LA 115 – Habitats Regulations assessment Revision 1 [online] available at: [e2fdab58-d293-4af7-b737-b55e08e045ae.standardsforhighways.co.uk](http://e2fdab58-d293-4af7-b737-b55e08e045ae.standardsforhighways.co.uk).

### 3.3 Information Gathering on European Sites

Information on each European site, including the qualifying features, the designated site citation (including condition assessment information for Sites of Special Scientific Interest (SSSIs)), the Natura 2000 Standard Data Form (Information Sheet on Ramsar Wetlands), conservation objectives, any supplementary advice and Site Improvement Plans were obtained from the Natural Resources Wales website<sup>5</sup> and the Joint Nature Conservation Committee (JNCC) website<sup>6</sup>.

Details of the Impact Risk Zones (IRZs) for the underpinning SSSI were obtained from the Multi Agency Geographical Information for the Countryside (MAGIC)<sup>7</sup> website. IRZs define the zones around SSSI where certain development activities could potentially have adverse impacts, based on the particular sensitivities of the features for which the SSSI is notified.

### 3.4 In-Combination Assessment Methodology

In-combination effects have been determined following a review of likely impacts resulting from incremental changes caused by other present or foreseeable plans or projects together with the site. This includes projects which have the potential to impact on the same designated sites as the proposed development, using the screening criteria outlined in Section 3.1.

This assessment includes development projects with valid planning permissions (including those under consideration by the planning authority) within The Isle of Anglesey County Council (Cyngor Sir Ynys Môn), the governing body for the county of Anglesey<sup>8</sup>. Consideration of Local Plan commitments has also been included within the in-combination effects, together with any Nationally Significant Infrastructure Projects (NSIPs).

For the purposes of this assessment, the following criteria were used to determine the planning applications that would be appropriate for the purposes of an in-combination assessment. The criteria are based on the type and scale of potential effects generated by a proposed development. The criteria are based on the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as most 'other developments' being considered fall under the Town and Country Planning regime. To ensure the assessment is proportionate, the criteria selected have been based on professional judgement as well as excluding small developments that are unlikely to have any effects on the designated sites and therefore no potential for in-combination effects:

- the development includes more than 1ha of development and which is not for a dwelling house development;
- the development includes more than 150 dwelling houses; and,
- the area of the development exceeds 5 hectares.

For there to be an in-combination effect with the proposed development, other developments would have to have some level of adverse impact. Developments were scoped out if they were found not to have any adverse impacts since there would be no in-combination effects from the proposed development to have an effect to the European sites. Similarly, in-combination effects with other developments will not occur if the proposed development is found to not have adverse impacts on European sites.

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<sup>5</sup> Natural Resources Wales (2019) Sites protected by European and international law [online] available at: [Natural Resources Wales / Sites protected by European and international law](https://naturalresources.wales/sites-protected-by-european-and-international-law)

<sup>6</sup> Joint Nature Conservation Council (2021). [Online] Available at: <http://jncc.defra.gov.uk/>

<sup>7</sup> Multi-Agency Geographic Information for the Countryside (MAGIC) [Online] Available at: <http://magic.defra.gov.uk/>

<sup>8</sup> <https://www.anglesey.gov.uk/en/Residents/Planning-building-control-and-conservation/Planning/Planning-decisions.aspx>

In-combination effects are possible where the proposals result in some level of adverse impact. Where in-combination effects were not identified within a development, it would be scoped out for the purposes of this HRA since there would be no in-combination effects on European sites.

### 3.5 Assessing Likelihood of Significant Effects

Consideration of elements of the proposed development that could potentially impact European sites, the qualifying features of those sites, the conservation status of the qualifying interests, and the vulnerability of the conservation objectives of the European sites are included in the screening process. Stage 1 Screening must be undertaken in all cases.

A search was undertaken in December 2020 by RML and May 2021 by Mott MacDonald Limited for all European sites within 2km of the site in line with DMRB LA 115 guidance<sup>4</sup>. A precautionary distance of 2km is considered for all identified European sites for the effects of visual disturbance and increases in noise.

Sites hydrologically connected to the proposed development could be affected by changes to water levels and water quality as a result of works, in the absence of appropriate mitigation measures. Searches were therefore undertaken for designated sites where the proposed development crosses or is adjacent to, upstream of, or downstream of, watercourses designated in part or wholly as a European site following guidance in DMRB LA 115<sup>4</sup>.

Additionally, sites designated for mobile species such as bats, birds and marine mammals, could be affected by the proposed development if those species for which the sites are designated for travel beyond the boundaries of the site and within the zone of influence of the impacts of the proposed development. A further search for European sites where bats are a primary qualifying feature within 30km of the site, and where marine mammals are a qualifying feature within 10km of the site, was therefore undertaken in line with DMRB LA 115<sup>4</sup>.

The 2km, 10km and 30km search areas have been applied to the site. The approach to this HRA is consistent with DMRB guidance<sup>4</sup>.

## 4 Screening Assessment

### 4.1 Identification of Sites

European Sites within 2km of the site are listed in Table 4.1 below and shown within a location plan within Appendix B. No additional SACs designated for bats or marine mammals have been identified within 30km and 10km respectively.

**Table 4.1: European Designated Sites within 2km of Plot 9 Parc Cybi**

Site Name	Designation	Distance from Site
Anglesey Terns/Morwenoliad Ynys Môn	Special Protection Area (SPA)	1.15km north
North Anglesey Marine/Gogledd Môn Forol	Special Area of Conservation (SAC)	1.4km north
Holy Island Coast/Glannau Ynys Gybi	SAC/SPA	1.93km west

Source: Mott MacDonald Limited, 2021

### 4.2 Assessment of Impact Pathways

Potential impacts and sources of disturbance from the proposed works include:

- Pollution event – resulting from an oil / fuel spill, animal waste, sewage or other pollution sources which could damage habitats as well as cause harm to species directly;
- Noise and vibration disturbance – resulting from piling, machinery, vehicle movements and personnel. Any such sources of disturbance could disturb or displace individuals using the areas surrounding the site to forage, commute and roost;
- Visual disturbance – from increased human activity and machinery; and,
- Artificial lighting disturbance – if there is a requirement for works to be undertaken at night, artificial lighting could displace any bats and birds using the agricultural land adjacent to the site.

### 4.3 Designated Sites Citation Details and Conservation Status

The following section documents the key qualifying features, citation details and conservation status for the European Sites. Current conservation objectives and site management are also detailed where available.

No specific supplementary advice or site improvement plans were identified for the designated sites. However, NRW state that “*site level feature condition assessments are important...for the development of management measures to improve these features*”.

#### 4.3.1 Anglesey Terns/Morwenoliad Ynys Môn SPA

Table 4.2 documents the key qualifying features, citation details and conservation status for the Anglesey Terns SPA.

**Table 4.2: Anglesey Terns/Morwenoliad Ynys Môn SPA Citation Details and Conservation Status**

National Site Network Site	Anglesey Terns/Morwenoliad Ynys Môn SPA
Distance from the closest part of the site	1.15km north

National Site Network Site	Anglesey Terns/Morwenoliad Ynys Môn SPA	
<b>Description of the site</b>		
<b>Key Qualifying features</b>		
Annex I species qualifying under Article 4.1 of the Directive (79/409/EEC)	<ul style="list-style-type: none"><li>● Roseate tern (<i>Sterna dougallii</i>) - 3 pairs representing 5% of the GB breeding population (5 year mean 1992 to 1996).</li><li>● Common tern (<i>Sterna hirundo</i>) - 189 pairs representing 1.5% of the GB breeding population (5 year mean 1992 to 1996).</li><li>● Arctic tern (<i>Sterna paradisaea</i>) - 1,290 pairs representing 2.9% of the GB breeding population (5 year mean 1992 to 1996).</li><li>● Sandwich tern (<i>Sterna sandvicensis</i>) - 460 pairs representing 3.3% of the GB breeding population (5 year mean 1993 to 1997).</li></ul>	
<b>Management of the site</b>		
Vision of the site	The stated objectives are to ensure that the integrity of the SPA is maintained or restored as appropriate, and ensure that the SPA contributes to achieving the aims of the Birds Directive, by maintaining or restoring: <ul style="list-style-type: none"><li>- The extent and distribution of the habitats of the qualifying features;</li><li>- The structure and function of the habitats of the qualifying features;</li><li>- The supporting processes on which the habitats of the qualifying features rely;</li><li>- The population of each of the qualifying features; and</li><li>- The distribution of the qualifying features within the site.</li></ul>	
<b>Current status of species or habitats and vulnerabilities</b>		
Site	Species	Status and vulnerabilities <sup>9,10,10,11</sup>
Anglesey Terns / Morwenoliad Ynys Môn SPA	<ul style="list-style-type: none"><li>● Roseate Tern</li><li>● Common tern</li><li>● Arctic tern</li><li>● Sandwich tern</li><li>● All tern species listed above</li></ul>	<p>The Roseate terns have abandoned the SPA and relocated to Rockabill Island SPA on the east coast of Ireland. Indicative Condition Assessment is unfavourable. Currently listed as least concern on the IUCN red list for Europe, red on the UK Birds of Conservation Concern (BoCC) and a priority species under Section 7 of the Environment (Wales) Act 2016.</p> <p>The Welsh trends contradict the UK's long-term trend (1986-2015) and short-term trend (2000-2016) of a decrease of 17% and 10% respectively. Indicative Condition Assessment is favourable. Currently listed as least concern on the IUCN red list and amber on the UK BoCC</p> <p>Both the UK's long-term trend (1986-2015) and short-term trend (2000-2016) show an increase of 19% and 17% respectively. Indicative Condition Assessment is favourable. Currently listed as least concern on the IUCN red list and amber on the UK BoCC.</p> <p>Both the UK's long-term trend (1986-2015) and short-term trend (2000-2016) show an increase of 5% and 13% respectively. Indicative Condition Assessment is favourable. Currently listed as least concern on the IUCN red list and amber on the UK BoCC.</p> <p>Vulnerabilities for the terns include disturbance of nests, competition for nest space, predators, loss of food supply, use of alternative sites, impacts whilst during wintering territories and climate change affecting food resources.</p>

Source: JNCC<sup>11</sup> and Natural Resources Wales<sup>12</sup>.

<sup>9</sup> BirdLife International (2015) The IUCN Red List of Threatened Species 2015 [online] Available at: [IUCN Red List of Threatened Species](http://iucnredlist.org)

<sup>10</sup> Hayhow DB, Bond AL, Douse A, Eaton MA, Frost T, Grice PV, Hall C, Harris SJ, Haverty S, Hearn RD, Noble DG, Oppel S, Williams J, Win I and Wotton S (2017) The state of the UK's birds 2016. The RSPB, BTO, WWT, DAERA, JNCC, NE, NRW and SNH, Sandy, Bedfordshire

<sup>11</sup> JNCC (2017) Natura 2000 – Standard Data form, Anglesey Terns 2017. [Online] Available at: [UK9013061.pdf \(jncc.gov.uk\)](http://jncc.gov.uk)

<sup>12</sup> Natural Resources Wales - SPA UK9013061 Register Entry001 and Evidence Report No: 236 – Special Protection Areas in Welsh Waters

### 4.3.2 North Anglesey Marine / Gogledd Môn Forol SAC

Table 4.3 documents the key qualifying features, citation details and conservation status for the North Anglesey Marine / Gogledd Môn Forol SAC.

**Table 4.3: North Anglesey Marine/ Gogledd Môn Forol SAC Citation Details and Conservation Status**

National Site Network Site	North Anglesey Marine/ Gogledd Môn Forol SAC			
Distance from the closest part of the Site	1.4km north			
<b>Description of the site</b>				
<b>Key Qualifying features</b>				
Annex II species	Annex II species present as a primary reason for selection of this site.	<ul style="list-style-type: none"> <li>• Harbour porpoise (<i>Phocoena phocoena</i>), with the SAC supporting up to 2.4% of the UK Celtic and Irish Seas Management Unit (MU) population.</li> </ul>		
<b>Management of the site</b>				
Vision of the site	<p>The stated conservation objectives are to ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for harbour porpoise in UK waters in the context of natural change, this will be achieved by ensuring that:</p> <ul style="list-style-type: none"> <li>• Harbour porpoise is a viable component of the site;</li> <li>• There is no significant disturbance of the species; and,</li> <li>• The condition of supporting habitats and processes, and the availability of prey is maintained.</li> </ul>			
<b>Current status of species or habitats and vulnerabilities</b>				
Site	Species	Status and vulnerabilities		
North Anglesey Marine / Gogledd Môn Forol SAC	Harbour porpoise	No data available. Currently listed as least concern on the IUCN red list and a priority species under Section 7 of the Environment (Wales) Act 2016. Vulnerable to impacts by fishing (by-catch and reduction in prey availability), discharge of contaminants, anthropogenic underwater sound, and collision with ships/boats/aquatic infrastructure <sup>13</sup> .		

### 4.3.3 Holy Island Coast / Giannau Ynys Gybi SAC

Table 4.4 documents the key qualifying features, citation details and conservation status for the Holy Island Coast SAC.

**Table 4.4: Holy Island Coast / Giannau Ynys Gybi SAC Citation Details and Conservation Status**

National Site Network Site	Holy Island Coast/ Giannau Ynys Gybi SAC			
Distance from the closest part of the project	1.93km west			
<b>Description of the site</b>				
<b>Key Qualifying features</b>				
Annex I habitats	Annex I habitats that are a primary reason for selection of this site	<ul style="list-style-type: none"> <li>• Vegetated sea cliffs of the Atlantic and Baltic coasts</li> <li>• European dry heaths</li> <li>• Additionally, Northern Atlantic wet heaths with cross-leaved heath (<i>Erica tetralix</i>) is present as</li> </ul>		

<sup>13</sup> JNCC (2019) North Anglesey Marine Conservation Objectives and Advice on Operations [online] available at: [North Anglesey Marine SAC: Draft Conservation Objectives And Advice On Activities \(naturalresources.wales\)](http://naturalresources.wales)

National Site Network Site	Holy Island Coast/ Glannau Ynys Gybi SAC	
a qualifying feature but is not a primary reason for selection.		
<b>Management of the site</b>		
Vision of the site	<ul style="list-style-type: none"> <li>The vision is for it to be in a favourable conservation status, where all conservation objectives (as listed in full within the Core Management Plan, 2008 CCW/NRW) are satisfied.</li> </ul>	
<b>Current status of species or habitats and vulnerabilities</b>		
Site	Habitats	Status and vulnerabilities
Holy Island Coast / Glannau Ynys Gybi SAC	<ul style="list-style-type: none"> <li>Vegetated sea cliffs of the Atlantic and Baltic coasts</li> <li>European dry heaths</li> <li>Northern Atlantic wet heaths with cross-leaved heath</li> </ul>	<p>Conservation status of the vegetated sea cliffs is considered unfavourable; and that of European dry heaths and wet heaths are unfavourable declining. Habitats are vulnerable to mowing or grassland cuts, grazing, recreational activities, air pollution, invasive non-native species, fire and fire suppression and biocenotic evolution and succession.</p>

Source: NRW <sup>14</sup>

#### 4.3.4 Holy Island Coast SPA

Table 4.5 documents the key qualifying features, citation details and conservation status for the Holy Island Coast SAC.

**Table 4.5: Holy Island Coast SPA Citation Details and Conservation Status**

National Site Network Site	Holy Island Coast / Glannau Ynys Gybi SPA	
Distance from the closest part of the project	1.93km west	
<b>Description of the site</b>		
<b>Key Qualifying features</b>		
Annex I species qualifying under Article 4.1 of the Directive (79/409/EEC)	<p>Annex I species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Chough (<i>Pyrrhocorax pyrrhocorax</i>) with the SPA supporting 6.4% of the GB breeding population and 7% of the non-breeding population.</li> </ul>	
<b>Management of the site</b>		
Vision of the site	<ul style="list-style-type: none"> <li>The vision is for it to be in a favourable conservation status, where all conservation objectives (as listed in full within the Core Management Plan, 2008 CCW) are satisfied.</li> </ul>	
<b>Current status of species or habitats and vulnerabilities</b>		
Site	Species	Status and vulnerabilities
Holy Island Coast / Glannau Ynys Gybi SPA	<ul style="list-style-type: none"> <li>Chough</li> </ul>	<p>Conservation status is considered to be unfavourable declining, namely due to the lack of supportive habitat resource. Vulnerabilities include impacts through land management (including grazing and burning management prescriptions), disturbances and use of veterinary preparations which would prevent dung faunal use (i.e. prey items for chough).</p>

<sup>14</sup> Countryside Council for Wales (2013), Core Management Plan Including Conservation Objectives for Glannau Ynys Gybi SAC and Glannau Ynys Gybi SPA [online] Available at: [2013\\_02\\_07\\_Glannau\\_Ynys\\_Gybi\\_WES\\_Plan\\_English\\_\(naturalresources.wales\).pdf](http://2013_02_07_Glannau_Ynys_Gybi_WES_Plan_English_(naturalresources.wales).pdf)

#### 4.4 Assessment of Habitats and Species – Anglesey Terns / Morwenoliad Ynys Môn SPA

The proposal is unlikely to cause any impacts directly upon tern species present within the SPA. There are no suitable nest locations present on the site itself, nor foraging habitats to support these birds. No disturbance to nesting sites within the SPA, impacts on food supply to chicks, increases in predator presence or competition for nest space would result from the proposals. The proposals would also not cause impacts to wintering territories or impact upon the use of alternative suitable sites. As such the Anglesey Terns / Morwenoliad Ynys Môn SPA would not be impacted. **No likely significant effects anticipated.**

#### 4.5 Assessment of Habitats and Species – North Anglesey Marine / Gogledd Môn Forol SAC

The key qualifying feature is the presence of 2.4% of the UK Celtic and Irish Seas MU population of harbour porpoise. The site itself does not include any habitats suitable for use by harbour porpoise.

The potentially damaging operations that would impact upon this species include those relating to fishing, anthropogenic underwater sound and collision with aquatic infrastructure and boats/ships. The proposed development does not include any of these operations with no additional shipping routes or additional vessels planned. There could however be impacts through discharge of contaminants into local watercourses, which may then enter the sea, in the absence of mitigation.

##### 4.5.1 Assessment of potential impacts – North Anglesey Marine / Gogledd Môn Forol SAC

In the absence of an appropriate drainage scheme to ensure that there is no surface water run-off, pollutant discharge or other effluent/contaminant entering watercourses and the sea, there may be impacts through a degradation of water quality, diffuse pollution and potentially localised build-ups of pollutants, or acute pollution events. These may arise from events such as fuel or chemical spillages or via vehicle wash areas. **Likely significant effects are possible.**

The topography of the inland site means that it is likely that the surface water flow would be across pastureland towards the west, before it meets the B4545 approximately 0.33km away. There is then approximately 1km of golf course and pasture before the coast. It is therefore very unlikely that any acute pollution events would occur within the sea (and SAC) but it is possible that diffuse events could occur with build up over time in the absence of mitigation.

The site design would include appropriate drainage to prevent any discharge of contaminants into local watercourses, surface water run-off, and the sea which may otherwise be detrimental to aquatic species and habitats (see drainage strategy outlined within the RIBA Stage 2 Master Planning Drainage Strategy Report<sup>15</sup>). It is not anticipated that the proposed development would impact upon the SAC or its qualifying species, the harbour porpoise, during construction or in operation.

#### 4.6 Assessment of Habitats and Species – Holy Island Coast/ Giannau Ynys Gybi SAC and SPA

The habitats which are qualifying features of the SAC are vegetated sea cliffs of the Atlantic and Baltic coasts; European dry heaths; and Northern Atlantic wet heaths with cross-leaved heath. The site will have no direct impact on any of the SAC habitats with no influences over grazing,

<sup>15</sup> Mott MacDonald (2021) RIBA Stage 2 Master Planning Drainage Strategy Report. Document reference: 100100943-MMD-PC-XX-RP-DR-0001

land management or activities within the SAC. Similarly, there are no anticipated impacts upon chough populations (qualifying feature of the SPA), with there being no suitable habitats onsite to support foraging or nesting chough.

#### 4.6.1 Assessment of Potential Impacts – Holy Island Coast / Glannau Ynys Gybi SAC

The air quality impacts of the proposed development have been assessed and described in accordance with the methodology outlined in the Air Quality Assessment within Chapter 3.2 of the Environment Report. The baseline assessment demonstrates that nitrogen oxide (NOx), sulphides and particulate matter (PM10 and PM2.5) concentrations at the site and surrounding developments are well below the applicable air quality standards limits.

The additional vehicular activity during operation, on average up to 25-30 HGVs per day, is likely to increase air pollution which could indirectly impact upon the habitats within the SAC over time, in the absence of mitigation. The site lies a distance of 1.93km from the SAC, notably reducing the effects of air-borne pollutants - NOx and sulphides are a risk within 200m<sup>16</sup>,<sup>17</sup> and particulates a risk within 50m<sup>18</sup>. Vehicles would not be allowed to idle within the confines of the site for longer than 5 minutes and the landscape design and management strategy includes a substantial minimum 10m vegetated screening buffer to be planted between the existing bund of trees and the developable area (as set out within the Consenting Envelope<sup>19</sup>), which would reduce operationally derived air-borne pollutants. As a result, the Site Relevant Critical Loads (SRCL) for the SAC as stated in the Air Pollution Information System (APIS) guidance<sup>20</sup>, are not anticipated to be exceeded. **No likely significant effects anticipated.**

A longer-term Governmental policy<sup>21</sup> highlights Wales strategy to increase air quality with measures to include heavy goods vehicles to be ultra-low emission by 2030. Other measures include a reduction in vehicle speed (up to 10mph) to reduce nitrogen dioxide levels and a strict no-idling policy for stationary vehicles.

<sup>16</sup> Institute of Air Quality Management (2019) A guide to the assessment of air quality impacts on designated nature conservation sites. Version 1.0, June 2019. [Online] Available at: [air-quality-impacts-on-nature-sites-2019.pdf \(iaqm.co.uk\)](http://air-quality-impacts-on-nature-sites-2019.pdf (iaqm.co.uk))

<sup>17</sup> This distance is typically applicable to roads which receive significant increases in traffic volumes (see IAQM, 2019 reference).

<sup>18</sup> Institute of Air Quality Management (2014) Guidance on the assessment of dust from demolition and construction. Version 1.1, February 2014. [Online] Available at: [construction-dust-2014.pdf \(iaqm.co.uk\)](http://construction-dust-2014.pdf (iaqm.co.uk))

<sup>19</sup> Mott MacDonald (2021) SDO Consenting Envelope. September 2021. Drawing Number: BCP21-006-05-00

<sup>20</sup> APIS (2021) Air Pollution Information Systems - Site Relevant Critical Loads and Source Attribution. [Online] Available at: <http://www.apis.ac.uk/src/>

<sup>21</sup> Welsh Government (2020) Clean Air Plan for Wales: Healthy Air, Healthy Wales [Online] available at: [40794 The Clean Air Plan for Wales \(gov.wales\)](http://40794 The Clean Air Plan for Wales (gov.wales))

# 5 Mitigation

## 5.1 Embedded Mitigation Measures

The following mitigation measures have been embedded into the site design for the proposed development in order to avoid impacts habitats and species, and as part of best practice:

- Throughout the construction, best practice guidance in reference to pollution prevention;
- Drainage related measures would include unlined swales with filter strips and gullies with oil separators, where appropriate and in line with the Sustainable Drainage Systems (SuDS) manual<sup>22</sup>. Pervious paving would be used where a risk of pollution is lowest. The drainage strategy includes the full measures (RIBA Stage 2 Master Planning Drainage Strategy Report) and the RIBA Stage 2 Indicative Master Plan<sup>23</sup>; and,
- Screening by bunding and vegetation would aid air quality, as would a no-idling policy and speed restrictions for vehicles onsite. The Environment Report<sup>24</sup> sets out the measures that would be implemented and Landscape Layout Plan<sup>25</sup> shows the proposed landscaping that would be integrated into the design, pending detailed design adjustments.

## 5.2 Other mitigation measures outside the designated sites' requirements

- Retention and enhancement of onsite ecological features (rocky outcrops, ponds and unimproved acid grassland) in line with requirements stated within the Consenting Envelope, which would be produced as a requirement for BREEAM (Building Research Establishment Environmental Assessment Method); and,
- Appropriate mitigation for species present onsite, such as removal of any reptile habitat, which would be completed under ecological supervision and as part of measures to be incorporated into a Construction Environmental Management Plan (CEMP).

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<sup>22</sup> CIRIA (2015) The SuDS Manual [online] Available at: [Item Detail \(ciria.org\)](#)

<sup>23</sup> Mott MacDonald (2021) RIBA Stage 2 Indicative Master Plan, Document Reference: 100100943-MMD-XX-DR-AR-0001

<sup>24</sup> Mott MacDonald (2021) North Wales BCP Environment Report. Document Reference: BCP21-002-00-00

<sup>25</sup> Mott MacDonald (2021) North Wales BCP RIBA Stage 2 Landscape Layout Plan (No document reference assigned)

# 6 Appropriate Assessment

## 6.1 Appropriate Assessment

### 6.1.1 Assessment of the Project Alone

The Stage 1 assessment screened in the following designated interest features of the North Anglesey Marine / Gogledd Môn Forol SAC, and the Holy Island Coast / Glannau Ynys Gybi SAC respectively:

- Water pollution; and,
- Air pollution.

Likely significant effects on these designated sites were anticipated from the proposed development in the absence of appropriate mitigation measures. Impact pathways were identified as follows:

- Damage to habitat from fuel, contaminants and other pollutants via surface water run-off, or via direct spill into watercourses or waterbodies; and,
- Air pollution from minor increase of vehicular use of the site with particular increases to nitrogen dioxide levels.

Following implementation of the mitigation set out in Section 5, the following table documents the assessment of significant effects on the North Anglesey Marine / Gogledd Môn Forol SAC, and the Holy Island Coast / Glannau Ynys Gybi SAC, in respect of the above impact pathways, in line with Stage 2 of the HRA process.

**Table 6.1: North Anglesey Marine / Gogledd Môn Forol SAC, and the Holy Island Coast / Glannau Ynys Gybi SAC – Appropriate Assessment**

Designated Interest Feature	Assessment of Effects	Significance of Effect
Harbour porpoise	Surface run-off of pollutants such as engine fuel and oil, from vehicles visiting the site, may impact upon the species by degrading the water quality and affecting prey availability.  At the scale of the operations proposed (and during construction), and location of the site away from the SAC itself, the mitigation measures to be in place will reduce the risk of such impacts effectively.	Negligible
Vegetated sea cliffs of the Atlantic and Baltic coasts		Negligible
European dry heaths	Distance from the site and mitigation measures proposed will reduce nitrogen dioxide and other air pollutants reaching the SAC. There will therefore be no significant impact on these features through air pollution, with mitigation in place.	
Northern Atlantic wet heaths with cross-leaved heath		

Source: Mott MacDonald Limited, 2021

### 6.1.2 In-Combination Assessment

As set out in the Stage 1 screening assessment, cumulative effects from the proposed development and projects and plans (both in construction and operation) in the wider area need to be considered.

The desk-based study identified no projects within 2km that would be considered to have an in-combination impact with the proposed development on the North Anglesey Marine / Gogledd

Môn Forol SAC; the Holy Island Coast / Glannau Ynys Gybi SAC and SPA; and Anglesey Terns / Morwenoliad Ynys Môn SPA.

## 7 Conclusions

Any adverse effects on the North Anglesey Marine / Gogledd Môn Forol SAC; the Holy Island Coast / Glannau Ynys Gybi SAC and SPA; and Anglesey Terns / Morwenoliad Ynys Môn SPA and their designated interest features alone or in combination with other projects are considered to be *de-minimis*, such that no adverse effects on the integrity of the European Sites are anticipated.

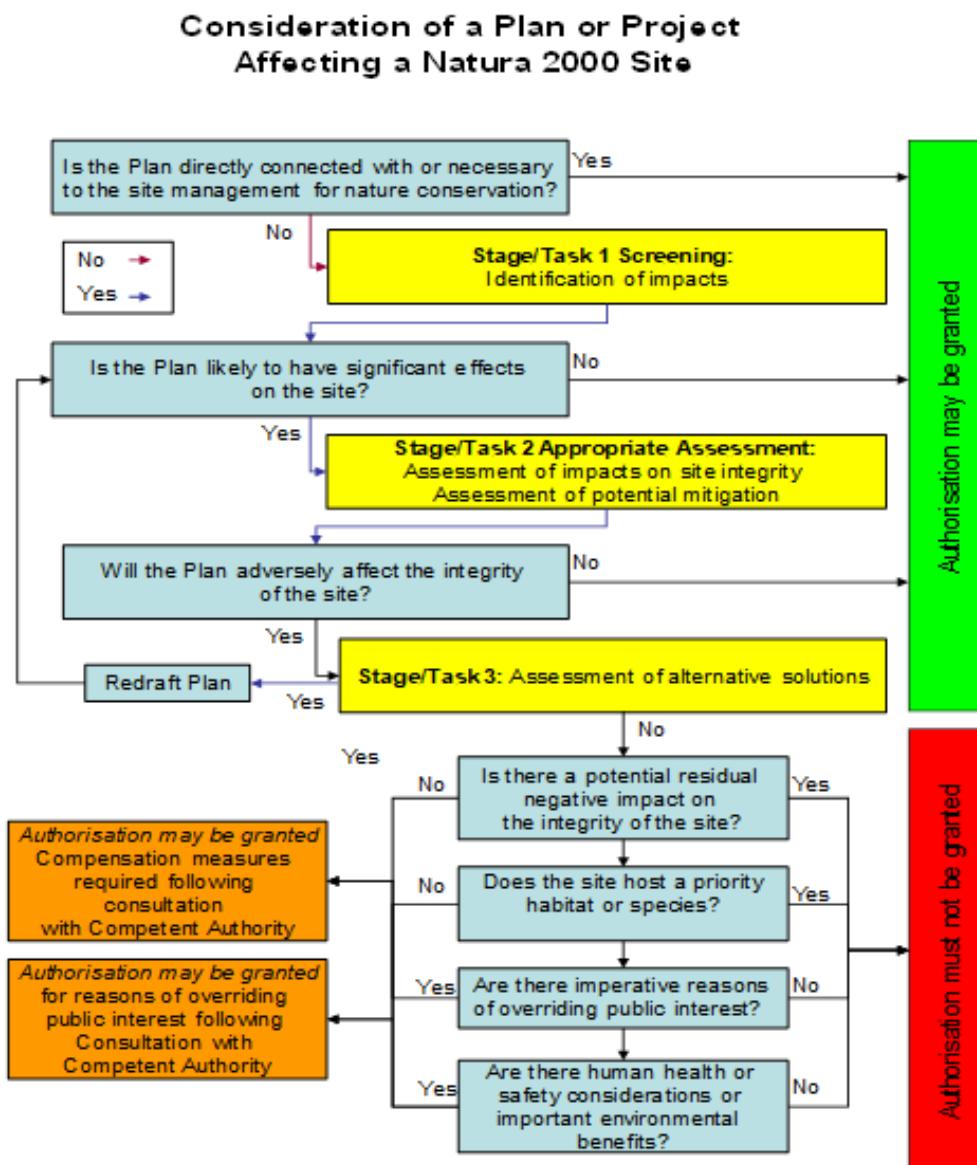
No impact pathways to any other internationally designated sites have been identified.

# Appendices

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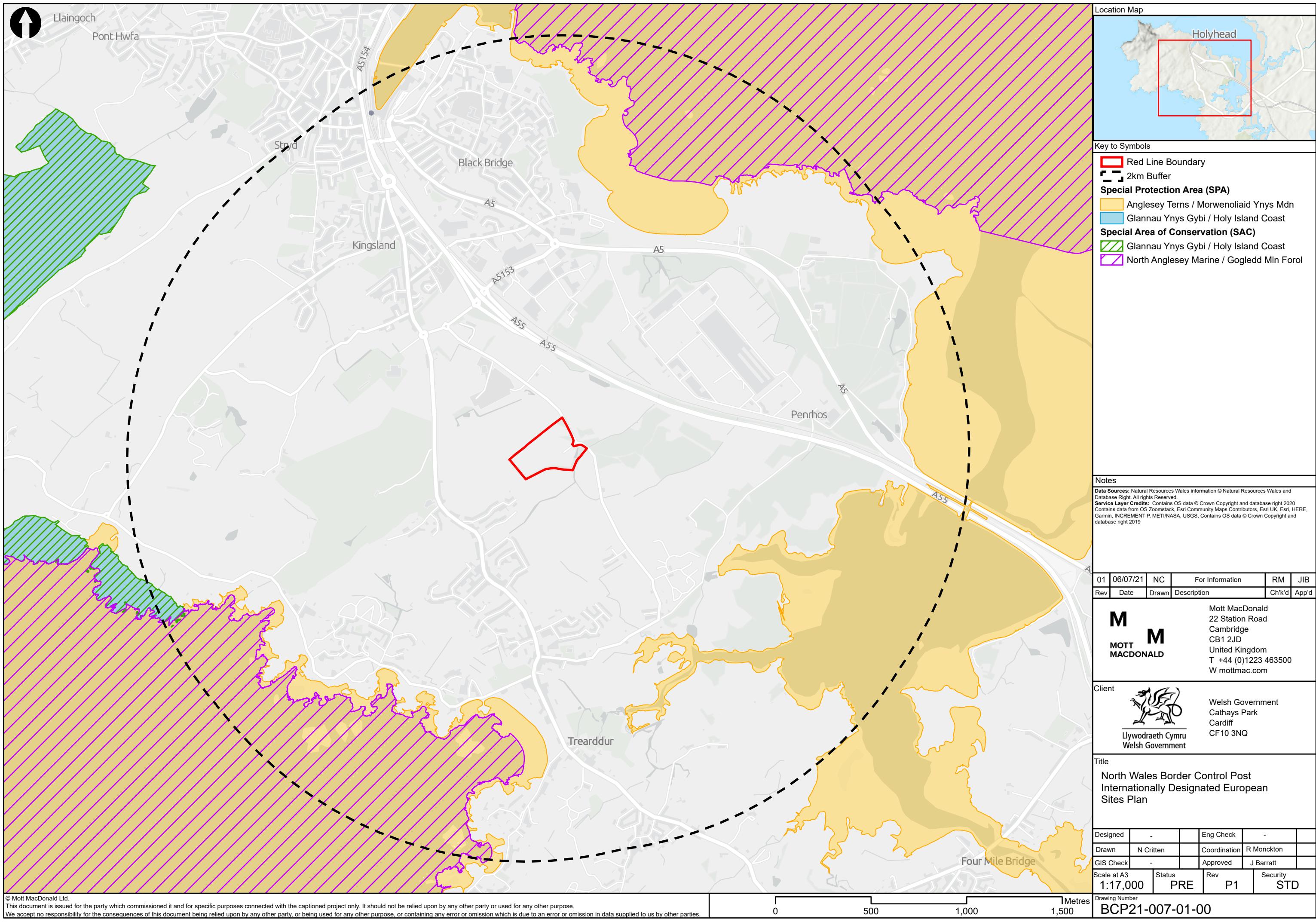
## A. HRA Process

Figure A.1: The Habitats Regulations Assessment Process



Source: Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC [November 2001].  
The term 'Task' is used in reference to an HRA of a plan and the term 'Stage' in reference to an HRA of a project.

## B. Statutory Sites





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