



LLANWERN

HRA Screening Report

Tata Steel UK Ltd

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Executive Summary

1. RSK Biocensus was commissioned by Tata Steel UK Ltd to prepare a Habitats Regulations Assessment (HRA) Screening Report (Stage 1) in relation to the proposed demolition of the former Hot Mill building and surrounding buildings/structures at Tata Steelworks in Llanwern, near Newport in South Wales.
2. This report considers whether the project will result in significant effects on four internationally important designated sites located within 10 km of the Site, which are designated for their nature conservation interests. These are:
 - Severn Estuary Special Areas of Conservation
 - Severn Estuary Special Protection Area
 - Severn Estuary Ramsar Site
 - River Usk Special Areas of Conservation
3. Having carried out a HRA Screening assessment, it is concluded that the proposed demolition activities are not likely to have a significant effect on any of the internationally important designated sites listed above, either alone or in combination with any other plans or projects.

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1 Introduction

1.1 Purpose of this report

- 1.1.1 The project is the demolition of the former Hot Mill building and surrounding buildings and structures at Tata Steelworks, Llanwern near Newport, South Wales. The site location is shown in Figure 1.
- 1.1.2 The site location falls within 10 km of four internationally important sites designated for their nature conservation interests. These comprise:
- Severn Estuary Special Areas of Conservation (SAC)
 - Severn Estuary Special Protection Area (SPA)
 - Severn Estuary Ramsar
 - River Usk Special Areas of Conservation (SAC)
- 1.1.3 The purpose of this report is to provide information to Newport City Council as the Competent Authority. The report presents the results of a Habitat Regulations Assessment (HRA) Stage 1 Screening assessment undertaken by RSK Biocensus in relation to the proposed works and to help to establish whether the proposed works are likely to have a significant effect on the qualifying features of the internationally important designated sites listed above.

1.2 Background and pre-screening

- 1.2.1 This HRA screening has been informed by ecological survey work completed by RSK Biocensus in 2025. The results of these surveys can be found in the following reports:
- RSK Biocensus (2025a) Llanwern Hot Mill – Preliminary Ecological Appraisal
 - RSK Biocensus (2025b) Llanwern Hot Mill – Breeding Bird Survey Report

2 Methodology

- 2.1.1 Habitats Regulations Assessment is a requirement of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The assessment must be made by the Competent Authority (Newport City Council), and this report has been prepared to inform their decision.
- 2.1.2 This HRA Screening has been undertaken with reference to guidance published by UK Government (2019) and the 'Habitats Regulations Assessment Handbook' (DTA Publications, 2021). Consideration has been given to the nature of the proposed works, and whether these would be likely to result in a significant effect on any of the qualifying features of the internationally important designated sites.
- 2.1.3 Details of the proposed works were examined (presented in Section 3.0); and documents relating to the Ramsar, SPA and SAC sites, together with the previous environmental reports prepared for the project (listed in Section 1.2). On a precautionary basis, all internationally important designated sites were considered within a radius of approximately 10 km from each work site. Screening matrices (adapted from National Highways, 2020) were used to assess systematically the likelihood of significant effects arising from each part of the works upon each designated site (Appendix B – HRA screening matrices), before drawing a conclusion on whether HRA Stage 2 Appropriate Assessment was required. Within this report the term 'International site' has been used to refer to Special Areas of Conservation (SAC), Special Protection Areas and wetlands of international importance designated under the Ramsar Convention (Ramsar sites).

2.2 HRA Stages

- 2.2.1 The aim of a HRA is to determine, in view of an International site's conservation objectives and qualifying features, whether a project (either alone and/or in combination), would have a significant adverse effect on the site. The four distinct stages of the HRA process are summarised below:
- 2.2.2 Stage 1: Screening is the first stage of the process and identifies the likely impacts upon an International site of a project (either alone or in combination with other plans or projects). Mitigation cannot be taken into consideration at this stage of the HRA. If the screening exercise concludes that Likely Significant Effects (LSE) cannot be ruled out, then Appropriate Assessment (Stage 2 of the process, see below) must be undertaken. It is important to note that the burden of evidence is to demonstrate, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment.
- 2.2.3 Stage 2: Appropriate Assessment considers the implications of the effects of the proposals for the site's conservation objectives (alone and in combination). At this stage, it needs to be determined, beyond reasonable scientific doubt, whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
- 2.2.4 Stage 3: Assessment of alternative solutions is the process which examines alternative ways of achieving the objectives of the project that would avoid adverse impacts on the integrity of an International site, should the avoidance or mitigation measures detailed at the Appropriate Assessment stage be insufficient to cancel out adverse effects.

2.2.5 Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain. An assessment is made as to whether or not the development is necessary for Imperative Reasons of Overriding Public Interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the international sites.

2.2.6 This report includes Stage 1 (Screening) only.

2.3 In-combination effects

2.3.1 The Habitats Regulations Assessment also requires consideration of the potential for in-combination effect with any other plans or projects. The plans and projects to be assessed for the purposes of this HRA Report will include:

- Permitted applications not yet implemented.
- Submitted applications not yet determined.

2.4 Assessment

2.4.1 The assessment must be made by Newport City Council as the Competent Authority, and this report has been prepared to inform their decision.

2.4.2 The assessment was undertaken by RHA3, a competent RSK Biocensus Principal Ecologist with full membership of the Chartered Institute for Ecology and Environmental Management and 20 years of experience.

2.5 HRA guidance

2.5.1 This report has been produced in accordance with the following guidance:

- European Commission, Directorate-General for Environment, 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, Publications Office, 2002.
- UK Government. Habitats Regulations Assessment assessments: protecting a European site. How a competent authority must decide if a plan or project proposal that affects a European site can go ahead. Published 24 February 2021. Last updated 6 December 2023. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>
- Tyldesley, D., and Chapman C., (2013) The Habitats Regulations Assessment Handbook. 4 January 2021 edition UK: DTA Publications Limited.

3 The proposed development

3.1 Proposed works details

- 3.1.1 Details of the works have been taken from the Method Statement dated 24th July 2025 (Haywood Crushing Demolition, 2025a) and the Project Environmental Plan dated 2nd June 2025 (Haywood Crushing Demolition, 2025b). The works involve controlled demolition of redundant structures, plant and equipment located within the former Hot Mill Building Area. They include:
- Decommissioning and removing all services, process equipment, including machinery, oil storage tanks, and associated systems.
 - The methodical dismantling of structural elements, such as pipework, cables, pipe bridges, and supporting frameworks, while maintaining structural safety throughout the process.
 - The controlled demolition of the Hot Mill structures, ensuring minimal impact on the surrounding area and compliance with all regulatory requirements.
 - The identification, removal, and safe disposal of hazardous materials, including asbestos, oils, and other potentially dangerous substances, in accordance with legal standards.
 - Implementing stringent safety measures, including controlled use of hot work, continuous monitoring of potential hazards, and thorough site cleaning to ensure the area is left in a safe, clear, and environmentally compliant condition.
 - Emergency Response will be developed for the CDM area which will be fully detailed within the Construction Phase Plan.
- 3.1.2 The method statement and Project Environment Plan include measures to manage dust including soft demolition, misting and monitoring with work to stop if acceptable levels are exceeded.
- 3.1.3 Noise and vibration will be managed through choice of machinery and minimising of vehicles reversing with the intention of maintaining noise levels below 70Db.
- 3.1.4 Water quality will be managed by using settlement tanks, oil separators and avoiding direct runoff to water courses. Works will be undertaken in accordance with the requirements of the existing Environmental Permit Site from Natural Resources Wales (ref: BS39051) which are described in Tata Steels Llanwern Effluent System Overview Procedure.
- 3.1.5 Lighting would be required during work hours.

3.2 Timing and Duration of Works

- 3.2.1 The works are planned to commence in September 2025 (subject to submission of the demolition notice). The expected duration is 36 months. Site working hours would be between 07:00 and 19:00.

3.3 Other plans or projects

- 3.3.1 A review of current planning applications on the Newport City Council Planning Portal was made (accessed 6th August 2025) to identify projects which could – in combination

with the proposed works – result in a cumulative effect on the designated sites. Planning applications made within the last three years were considered and included all major developments. For Developments of National Significance the timescale was extended to the last five years on account of the typically longer implementation times.

3.3.2 A list of these planning applications is detailed in Appendix A.

4 Designated Sites

- 4.1.1 Table 1 below lists all of the International sites located within 10 km of the site. Their locations are shown in Figure 2.
- 4.1.2 Each of these designated sites are described in Sections 4.2-4.5 below, with specific reference to their qualifying features and conservation objectives.

Table 1: Distance to designated sites from the proposed development

Designated Site	Distance (and compass direction)
Severn Estuary SAC (Wales)	3.66km to south
Severn Estuary SPA (Wales)	3.66km to south
Severn Estuary Ramsar (Wales)	3.66km to south
River Usk SAC	4.25km to west

4.2 Severn Estuary SAC

Qualifying Features

- 4.2.1 The Severn estuary has been designated as a SAC on the basis that it supports the following habitats and species of European importance (Natural England 2018; Natural England and the Countryside Council for Wales 2009):
- 4.2.2 Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks, Estuaries, Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats, Reefs, Atlantic salt meadows (*Glaucopuccinellietalia maritima*); Sea lamprey (*Petromyzon marinus*), River lamprey (*Lampetra fluviatilis*); Twaite shad (*Alosa fallax*).

Conservation Objectives

- 4.2.3 The conservation objective for the estuaries feature of the Severn Estuary SAC is to maintain the feature in favourable condition, as defined: The total extent of the estuary is maintained; the characteristic physical form (tidal prism/cross sectional area) and flow (tidal regime) of the estuary is maintained. The characteristic range and relative proportions of sediment sizes and sediment budget within the site is maintained. The extent, variety and spatial distribution of estuarine habitat communities within the site is maintained. The extent, variety, spatial distribution and community composition of hard substrate habitats and their notable communities is maintained. The abundance of the notable estuarine species assemblages is maintained or increased.
- 4.2.4 The conservation objective for the subtidal sandbanks feature of the Severn Estuary SAC is to maintain the feature in favourable condition, as defined: the total extent of the subtidal sandbanks within the site is maintained. The extent and distribution of the individual subtidal sandbank communities within the site is maintained. The community composition of the subtidal sandbank feature within the site is maintained. The variety and distribution of sediment types across the subtidal sandbank feature is maintained. The gross morphology (depth, distribution and profile) of the subtidal sandbank feature within the site is maintained.

- 4.2.5 The conservation objective for “mudflats and sandflats” feature of the Severn Estuary SAC is to maintain the feature in favourable condition, as defined: The total extent of the mudflats and sandflats feature is maintained. The variety and extent of individual mudflats and sandflats communities within the site is maintained. The distribution of individual mudflats and sandflats communities within the site is maintained. The community composition of the mudflats and sandflats feature within the site is maintained. The topography of the intertidal flats and the morphology (dynamic processes of sediment movement and channel migration across the flats) are maintained.
- 4.2.6 The conservation objective for the Atlantic salt meadow feature of the Severn Estuary SAC is to maintain the feature in favourable condition, as defined: the total extent of Atlantic salt meadow and associated transitional vegetation communities within the site is maintained. The extent and distribution of the individual Atlantic salt meadow and associated transitional vegetation communities within the site is maintained. The zonation of Atlantic salt meadow vegetation communities and their associated transitions to other estuary habitats is maintained. The relative abundance of the typical species of the Atlantic salt meadow and associated transitional vegetation communities is maintained. The abundance of the notable species of the Atlantic salt meadow and associated transitional vegetation communities is maintained. The characteristic stepped morphology of the salt marshes and associated creeks, pills, drainage ditches and pans, and the estuarine processes that enable their development, is maintained. Any areas of *Spartina anglica* salt marsh (SM6) are capable of developing naturally into other saltmarsh communities.
- 4.2.7 The conservation objective for the reefs feature of the Severn Estuary SAC is to maintain the feature in a favourable condition, as defined: the total extent and distribution of Sabellaria reef is maintained. The community composition of the Sabellaria reef is maintained. The full range of different age structures of Sabellaria reef are present. The physical and ecological processes necessary to support Sabellaria reef are maintained.
- 4.2.8 The conservation objective for the River Lamprey feature of the Severn Estuary SAC is to maintain the feature in a favourable condition, as defined: the migratory passage of both adult and juvenile river lamprey through the Severn Estuary between the Bristol Channel and any of their spawning rivers is not obstructed or impeded by physical barriers, changes in flows, or poor water quality. The size of the river lamprey population in the Severn Estuary and the rivers which drain into it, is at least maintained and is at a level that is sustainable in the long term. The abundance of prey species forming the river lamprey’s food resource within the estuary, is maintained. Toxic contaminants in the water column and sediment are below levels which would pose a risk to the ecological objectives.
- 4.2.9 The conservation objective for the Sea Lamprey feature of the Severn Estuary SAC is to maintain the feature in a favourable condition, as defined: the migratory passage of both adult and juvenile sea lamprey through the Severn Estuary between the Bristol Channel and any of their spawning rivers is not obstructed or impeded by physical barriers, changes in flows, or poor water quality. The size of the sea lamprey population in the Severn Estuary and the rivers which drain into it, is at least maintained as is at a level that is sustainable in the long term. The abundance of prey species forming the sea lamprey’s food resource within the estuary, is maintained. Toxic contaminants in the water column and sediment are below levels which would pose a risk to the ecological objectives described above.

- 4.2.10 The conservation objective for the Twaite Shad feature of the Severn Estuary SAC is to maintain the feature in a favourable condition, as defined: the migratory passage of both adult and juvenile twaite shad through the Severn Estuary between the Bristol Channel and their spawning rivers is not obstructed or impeded by physical barriers, changes in flows or poor water quality. The size of the twaite shad population within the Severn Estuary and the rivers draining into it is at least maintained and is at a level that is sustainable in the long term. The abundance of prey species forming the Twaite Shad's food resource within the estuary, in particular at the salt wedge, is maintained. Toxic contaminants in the water column and sediment are below levels which would pose a risk to the ecological objectives described above.

4.3 Severn Estuary SPA

Qualifying features

- 4.3.1 The Severn estuary has been designated as a SPA on the basis that it supports the following habitats and species of European importance (Natural England 2019; Natural England and the Countryside Council for Wales 2009):
- 4.3.2 Bewick's swan (*Cygnus columbianus bewickii*) (Non-breeding), Common Shelduck (*Tadorna tadorna*) (Non-breeding), Gadwall (*Anas strepera*) (Non-breeding), Dunlin (*Calidris alpina alpina*) (Non-breeding), Common redshank (*Tringa tetanus*) (Non-breeding) and Greater white-fronted goose (*Anser albifrons albifrons*) (Non-breeding). The site also has an internationally important assemblage of waterfowl.

Conservation Objectives

- 4.3.3 The conservation objective is to maintain the Bewick's swan population and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the Bewick's swan population is no less than 289 individuals (ie the 5 year peak mean between 1988/9 - 1992/3); the extent of saltmarsh at the Dumbles is maintained; the extent of intertidal mudflats and sandflats at Frampton Sands, Waveridge Sands and the Noose is maintained; the extent of vegetation with an effective field size of >6 ha and with unrestricted bird sightlines > 500m at feeding, roosting and refuge sites are maintained; greater than 25% cover of suitable soft leaved herbs and grasses in winter season throughout the transitional saltmarsh at the Dumbles is maintained; aggregations of Bewick's swan at feeding, roosting and refuge sites are not subject to significant disturbance.
- 4.3.4 The conservation objective is to maintain the Common shelduck population and its supporting habitats in favourable condition, as defined below: the 5 year peak mean population size for the wintering shelduck population is no less than 2,892 individuals (ie the 5 year peak mean between 1988/9 - 1992/3); the extent of saltmarsh is maintained; the extent of intertidal mudflats and sandflats is maintained; the extent of hard substrate habitats is maintained; the abundance and macro-distribution of suitable invertebrates in intertidal mudflats and sandflats is maintained; unrestricted bird sightlines of >200m at feeding and roosting sites are maintained; aggregations of shelduck at feeding or roosting sites are not subject to significant disturbance.
- 4.3.5 The conservation objective is to maintain the Gadwall population and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the wintering gadwall population is no less than 330 (ie the 5 year peak mean between 1988/9

- 1992/3); the extent of intertidal mudflats and sandflats is maintained; unrestricted bird sightlines of >200m at feeding and roosting sites are maintained; aggregations of gadwall at feeding or roosting sites are not subject to significant disturbance.

- 4.3.6 The conservation objective is to maintain the Dunlin population and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the wintering dunlin population is no less than 41,683 individuals (ie the 5 year peak mean between 1988/9 - 1992/3); the extent of saltmarsh and associated strandlines is maintained; the extent of intertidal mudflats and sandflats is maintained; the extent of hard substrate habitats is maintained; the extent of vegetation with a sward height of 200m at feeding and roosting sites are maintained; aggregations of dunlin at feeding or roosting sites are not subject to significant disturbance.
- 4.3.7 The conservation objective is to maintain the Common redshank population and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the wintering redshank population is no less than 2,013 individuals (ie the 5 year peak mean between 1988/9 - 1992/3); the extent of saltmarsh and associated strandlines is maintained; the extent of intertidal mudflats and sandflats is maintained; the extent of hard substrate habitats is maintained; the extent of vegetation with a sward height of 200m at feeding and roosting sites are maintained; aggregations of redshank at feeding or roosting sites are not subject to significant disturbance.
- 4.3.8 The conservation objective is to maintain the Greater white-fronted goose population and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the wintering European white fronted goose population is no less than 3,002 individuals (i.e. the 5 year peak mean between 1988/9-1992/3); the extent of saltmarsh at the Dumbles is maintained; the extent of intertidal mudflats and sandflats at Frampton Sands, Waveridge Sands and the Noose is maintained; greater than 25% cover of suitable soft-leaved herbs and grasses is maintained during the winter on saltmarsh areas; unrestricted bird sightlines of >200m at feeding and roosting sites are maintained; aggregations of European white-fronted goose at feeding or roosting sites are not subject to significant disturbance.
- 4.3.9 The conservation objective is to maintain the waterfowl assemblage and its supporting habitats in favourable condition, as defined: the 5 year peak mean population size for the waterfowl assemblage is no less than 68,026 individuals (ie the 5 year peak mean between 1988/9 - 1992/3); the extent of saltmarsh and their associated strandlines is maintained; the extent of intertidal mudflats and sandflats is maintained; the extent of hard substrate habitats is maintained; extent of vegetation of 500m at feeding and roosting sites are maintained; waterfowl aggregations at feeding or roosting sites are not subject to significant disturbance.

4.4 Severn Estuary Ramsar

Qualifying features

- 4.4.1 The Severn estuary has been designated as a Ramsar site on the basis that it supports the following habitats and species of European importance (Natural England and the Countryside Council for Wales 2009):
- 4.4.2 Estuaries, Assemblage of migratory fish species (Sea Lamprey, River Lamprey, Twaite Shad, Allis Shad, Salmon, Sea Trout, Eel), Bewick's Swan, European white-fronted

goose, Dunlin, Redshank, Shelduck, Gadwall, internationally important populations of waterfowl.

Conservation Objectives

- 4.4.3 The conservation objective for the estuaries feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SAC estuaries feature (refer to section 4.2.3 of this document), in so far as these objectives are applicable to the area designated as Ramsar Site and as defined: the total extent of the estuary is maintained; the characteristic physical form (tidal prism/cross sectional area) and flow (tidal regime) of the estuary is maintained; the characteristic range and relative proportions of sediment sizes and sediment budget within the site is maintained; the extent, variety and spatial distribution of estuarine habitat communities within the site is maintained; the extent, variety, spatial distribution and community composition of hard substrate habitats and their notable communities is maintained; the abundance of the notable estuarine species assemblages is maintained or increased; the physico-chemical characteristics of the water column support the ecological objectives; Toxic contaminants in water column and sediment are below levels which would pose a risk to the ecological objectives.
- 4.4.4 The conservation objective for the assemblage of migratory fish species feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined: the migratory passage of both adults and juveniles of the assemblage of migratory fish species through the Severn Estuary between the Bristol Channel and any of their spawning rivers is not obstructed or impeded by physical barriers, changes in flows, or poor water quality; the size of the populations of the assemblage species in the Severn Estuary and the rivers which drain into it, is at least maintained and is at a level that is sustainable in the long term; the abundance of prey species forming the principle food resources for the assemblage species within the estuary, is maintained. Toxic contaminants in the water column and sediment are below levels which would pose a risk to the ecological objectives.
- 4.4.5 The conservation objective for the “Bewick’s swan” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “Bewick’s swan” feature (refer to section 4.3.3).
- 4.4.6 The conservation objective for the “shelduck” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “shelduck” feature (refer to section 4.3.4).
- 4.4.7 The conservation objective for the “gadwall” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “gadwall” feature (refer to section sections 4.3.5).
- 4.4.8 The conservation objective for the “dunlin” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “dunlin” feature (refer to section 4.3.6).
- 4.4.9 The conservation objective for the “redshank” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “redshank” feature (refer to section sections 4.3.7).

- 4.4.10 The conservation objective for the “Greater white-fronted goose” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “European white-fronted goose” feature (refer to section 4.3.8).
- 4.4.11 The conservation objective for the “internationally important assemblage of waterfowl” feature of the Severn Estuary Ramsar Site is to maintain the feature in favourable condition, as defined by the conservation objective for the SPA “internationally important assemblage of waterfowl” feature (refer to section sections 4.3.9).

4.5 River Usk SAC

Qualifying Features

- 4.5.1 The River Usk has been designated as a SAC on the basis that it supports the following habitats and species of European importance (Natural Resources Wales 2022):
- 4.5.2 Sea lamprey (*Petromyzon marinus*), Brook lamprey (*Lampetra planeri*), River lamprey (*Lampetra fluviatilis*), Twaite shad (*Alosa fallax*), Allis shad (*Alosa alosa*), Atlantic salmon (*Salmo salar*), Bullhead (*Cottus gobio*), European otter (*Lutra lutra*) and watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation.

Conservation Objectives

- 4.5.3 The ecological status of the watercourse is a major determinant of Favourable Conservation Status for all features. The required conservation objective for the watercourse is defined as: the capacity for the habitats in the SAC to support each feature at near natural population levels, as determined by predominantly unmodified ecological and hydromorphological processes and characteristics, should be maintained as far as possible, or restored where necessary. The ecological status of the water environment should be sufficient to maintain a stable or increasing population of each feature. This will include elements of water quantity and quality, physical habitat and community composition and structure. Flow regime, water quality and physical habitat should be maintained in, or restored as far as possible to, a near-natural state, in order to support the coherence of ecosystem structure and function across the whole area of the SAC. All known breeding, spawning and nursery sites of species features should be maintained as suitable habitat as far as possible, except where natural processes cause them to change. Flows, water quality, substrate quality and quantity at fish spawning sites and nursery areas will not be depleted by abstraction, discharges, engineering or gravel extraction activities or other impacts to the extent that these sites are damaged or destroyed. The river planform and profile should be predominantly unmodified. Physical modifications having an adverse effect on the integrity of the SAC, including, but not limited to, revetments on active alluvial riverbanks using stone, concrete or waste materials, unsustainable extraction of gravel, addition or release of excessive quantities of fine sediment, will be avoided. River SSSI features should be in favourable condition. In the case of the Usk Tributaries SSSI, the SAC habitat is not underpinned by a river habitat SSSI feature. In this case, the target is to maintain the characteristic physical

features of the river channel, banks and riparian zone. Artificial factors impacting on the capability of each species feature to occupy the full extent of its natural range should be modified where necessary to allow passage, e.g., weirs, bridge sills, acoustic barriers. Natural factors such as waterfalls, which may limit the natural range of a species feature or dispersal between naturally isolated populations, should not be modified. Flows during the normal migration periods of sea and river lamprey will not be depleted by abstraction to the extent that passage upstream to spawning sites is hindered. Flow objectives for assessment points in the Usk Catchment Abstraction Management Strategy will be agreed by NRW as necessary. It is anticipated that these limits will concur with the standards used by the Review of Consents process. Water Quality targets follow those in the revised Common Standards Monitoring Guidance for Rivers (JNCC 2016), with targets for organic pollution (DO, BOD and ammonia), phosphate, trophic diatom index and acidification. Potential sources of pollution not addressed in the review of consents, such as contaminated land, will be considered in assessing plans and projects.

5 Screening of likely significant effects

- 5.1.1 The likely impacts of the project in relation to all of the designated sites are described below, along with a statement of the significance of effects for each one. See Appendix B for detailed screening matrix for each site.

5.2 Impacts

Habitat loss and damage

- 5.2.1 The project site boundary does not overlap with any international sites. The habitats present are a mixture of buildings, hard standing and scrub, ruderal and ephemeral vegetation. Whilst the buildings are thought to support a range of breeding birds including peregrine falcon, herring gull and lesser black back gulls which have been identified on site (RSK Biocensus 2025b), the habitats present are not suitable for species which make up the features of international sites in the surrounding area. No birds designated as features of the Severn Estuary SPA and Ramsar were identified on site during the breeding bird surveys undertaken by RSK Biocensus in 2025 (RSK Biocensus 2025b). Therefore it is considered that the project would not result in the loss or damage to any habitat within international sites or of functionally linked land used by their qualifying features.

Disturbance

- 5.2.2 The project is approximately 3.7km to the nearest international site boundary. At this distance there can be no possibility of disturbance, either from noise or visually from the works included in the project, within any international site.
- 5.2.3 As stated above, no bird species designated as features of the Severn Estuary SPA and Ramsar Site were identified on the site by breeding bird surveys undertaken by RSK Biocensus in 2025 (RSK Biocensus 2025b).
- 5.2.4 Wildfowl and wader populations which contribute to the Severn Estuary SPA and Ramsar Site designations are likely to use wetlands and water bodies outside of the designation boundaries for feeding and roosting and such habitats represent functionally linked land. For example the grazing marsh habitat within the Gwent Levels SSSI is likely to be used and the closest point of this designation is approximately 700m from the project site boundary. Disturbance from construction activities to wildfowl and waders, including from noise, lighting and visual stimuli, are usually not considered to extend beyond a 500m radius from the project site. This is a precautionary distance and in reality the potential disturbance zone for particular species from different construction activities would generally be less than this. Within a 500m radius of the site water bodies and wetlands are limited to very small and generally artificial features which are already subject to background disturbance, for example from transport infrastructure. Habitats within this radius are of poor suitability for water birds which contribute to the Severn Estuary SPA and Ramsar Site features and therefore they will not be affected by the project through disturbance.

Air quality

- 5.2.5 Impacts to habitats due to construction dust are generally not considered to result in significant ecological impacts beyond 50m (Holman et al. 2014) and are likely to be restricted to a smaller radius with good construction site management. Given the closest boundary to an International Site is approximately 3.7km no effects to habitats within International Sites are expected. Given the lack of good quality water bodies and wetland within 500m of the project site functionally linked land is also not expected to be affected by dust emissions.

Water quality

- 5.2.6 Water run-off from the site (run-off from the roof of the Hot Mill building and pumped out from basements) is discharged from the site via a controlled system which ultimately drains into the Gwent Levels (via 'Drain '6' to the north of the site) and then into the Severn Estuary. This therefore provides a potential impact pathway for water pollution to an international site if water pollution risks are not managed appropriately during the project. However the monitoring of controlled water/effluent discharges under the existing Environmental Permit would remain in force during demolition works. Monitoring of effluent discharges to drains '6-8', involve a mixture of continuous monitoring and daily sampling of north and south drains, oil catchment areas and settling lagoons, which was agreed in 2013 with Natural Resources Wales. The effluent system has a large network of ditches and settling lagoons prior to the consented discharge point and continuous monitoring probes for pH, oil and turbidity. Thereafter the consent point, there is c. one mile of open ditch before it arrives at the Tata storm water pump house (SWPH) before being discharged in to the Severn Estuary (via the Gwent Levels SSSI). Main energy control (24hrs a day/7 days a week) receive monitoring probe alarms and have the facility to remotely switch off the SWPH to stop discharges into the estuary. This monitored water treatment and drainage system, which is on site, would continue to operate throughout works and would therefore collect/treat/monitor all water run-off from the site during works. In addition the Project Environment Plan (Haywood Crushing Demolition, 2025b) includes provision for avoiding the release of pollutants into the aquatic environment and including preventing direct runoff to water courses and use of a settlement system.

5.3 Potential for likely significant effects

Severn Estuary SAC

- 5.3.1 The conservation objectives for this SAC related to coastal habitats and several migratory species of fish. Due to its nature and its distance to the international site, the project is predicted to have no likely significant effect upon the conservation objectives or integrity of the Severn Estuary SAC.

Severn Estuary SPA

- 5.3.2 The conservation objectives for this SPA relate to populations of non-breeding wildfowl and waders and a non-breeding waterbird assemblage. Due to the nature of the project, the habitats present within and around the project site and its distance to the international site, the project is predicted to have no likely significant effect upon the conservation objectives or integrity of the Severn Estuary SPA.

Severn Estuary Ramsar

- 5.3.3 The designation criteria for this Ramsar Site relate to coastal habitats, migratory species, fish populations and non-breeding waterfowl populations. Due to the nature of the project, the habitats present within and around the project site and its distance to the international site, the project is predicted to have no likely significant effect upon the conservation objectives or integrity of the Severn Estuary SPA.

River Usk SAC

- 5.3.4 The conservation objectives for this SAC related to river habitats and several migratory species of fish. Due to its nature and its distance to the international site, the project is predicted to have no likely significant effect upon the conservation objectives or integrity of the River Usk SAC.

5.4 In combination effects

- 5.4.1 There is anticipated to be no impacts on internationally designated sites from the proposed works alone. It is considered that combined with other projects listed in Appendix A there would be no in combination effects with other projects.
- 5.4.2 The project involves demolition of redundant structures at the former Hot Mill building and surrounding areas

6 Conclusions

- 6.1.1 Habitats Regulations Assessment is a requirement of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The assessment must be made by the Competent Authority (Newport City Council), and this report has been prepared to inform their decision.
- 6.1.2 The project involves demolition of the former Hot Mill building and surrounding structures over 36 months.
- 6.1.3 The potential for significant effects arising from the project has been considered in relation to the following internationally important designated sites:
 - Severn Estuary SAC
 - Severn Estuary SPA
 - Severn Estuary Ramsar
 - River Usk SAC
- 6.1.4 Having carried out a HRA Screening assessment it is considered that the works are not likely to result in a significant effect on any internationally important designated site, either alone or in combination with any other plans or projects.

7 References

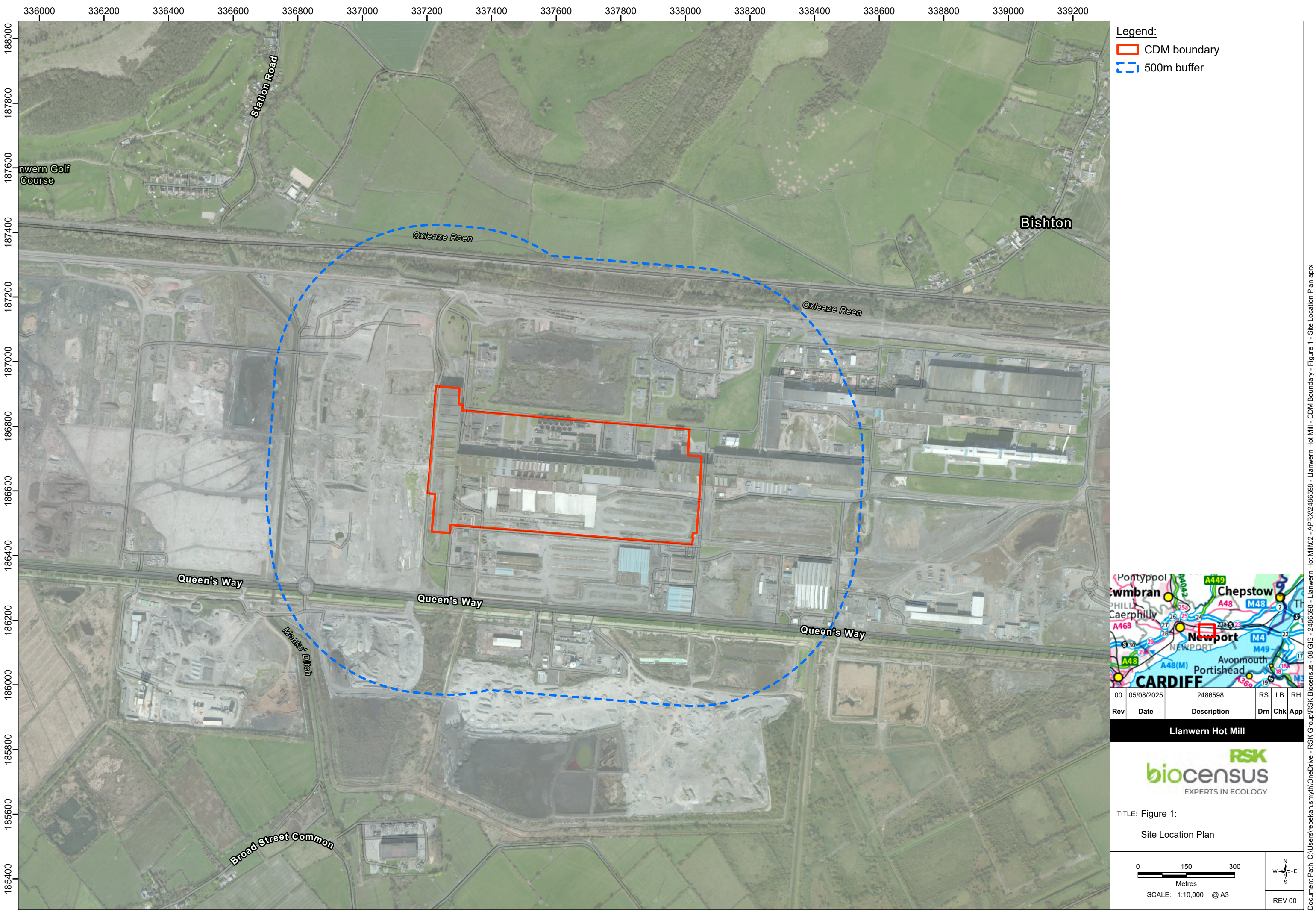
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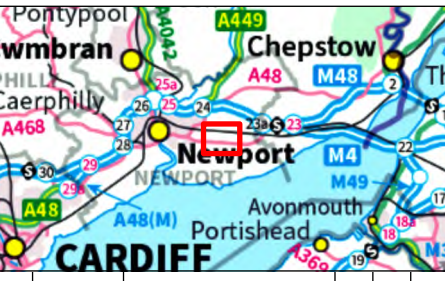
Figures

Figure 1: Site location plan

Figure 2: Designated sites within 10km



- Legend:
- CDM boundary
 - 500m buffer



00	05/08/2025	2486598	RS	LB	RH
Rev	Date	Description	Drn	Chk	App

Llanern Hot Mill



TITLE: Figure 1:
Site Location Plan

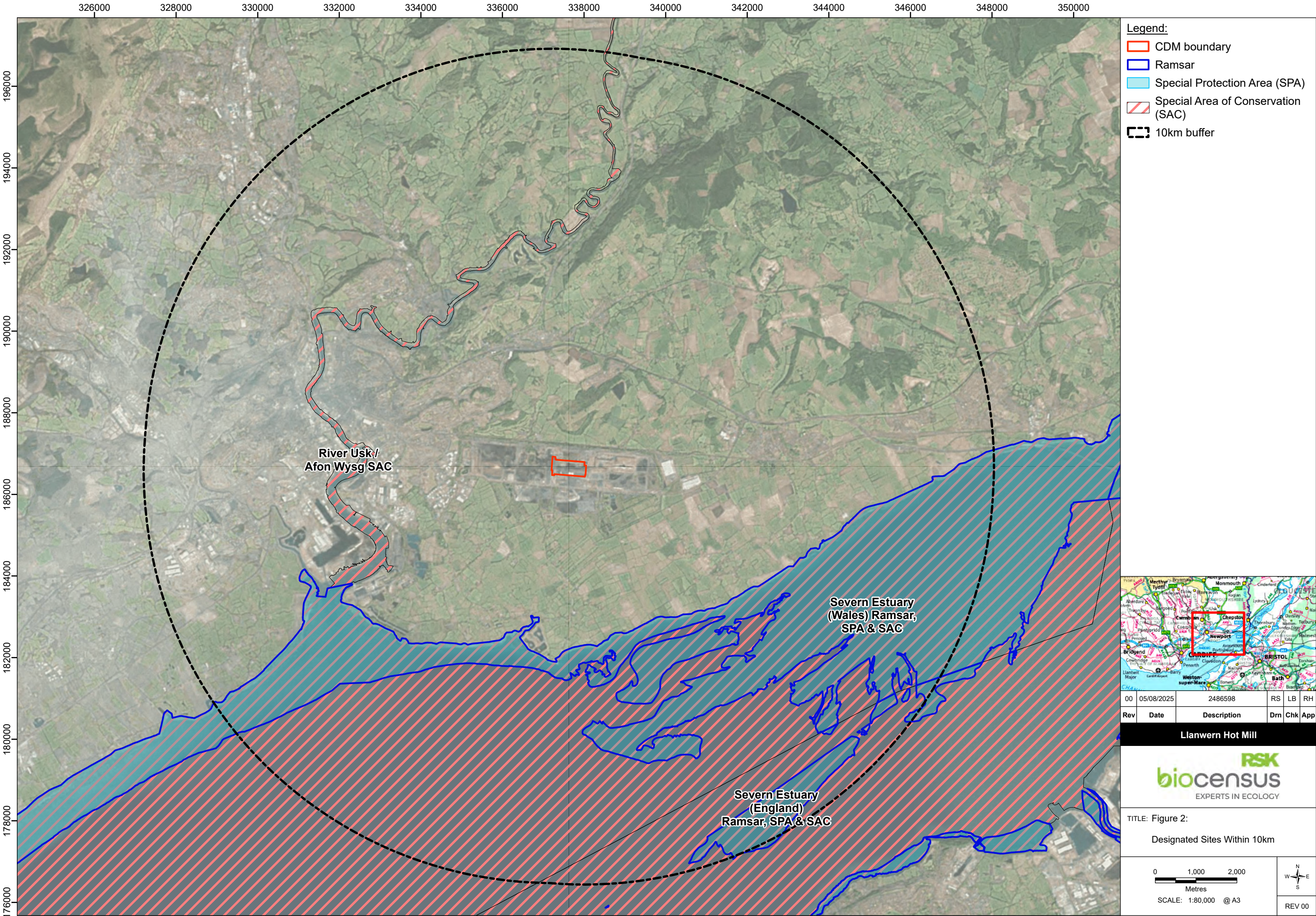
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Appendix A – Planning Applications

Table 2: Other planning applications to be considered in combination.

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
Land At Uskmouth Power Station West Nash Road Nash Newport NP18 2BZ 25/0407	Removal of stored pulverised fuel ash (pfa) and the installation of a new battery energy storage system (bess) with all associated drainage, infrastructure, engineering and associated utilities connections	Awaiting decision	0.3km	0.2km
Former Depot Coverack Road Newport South Wales 25/0333	Proposed development of 40no. Homes and associated works	Granted subject to S106	0km	3.9km
Unit 10 To 11 Port Road Maesglas Retail Park Newport South Wales NP20 2NS 25/0266	Extension to provide additional storage space	Awaiting decision	0.9km	2.9km
Land At Traston Lane Newport South Wales 25/0220	26 affordable dwellings, new access works, landscape planting, a new pumping station and associated works	Awaiting decision	1km	2.9km
South Dock East Way Road Alexandra Docks Newport South Wales 25/0069	Construction and operation of a mill including storage of raw materials, to produce 'green' cement from recycled, non-hazardous, waste materials, storage of the product and onward distribution	Awaiting decision	0.2km	0.6km
Unit 3A To 3B Nash Mead Newport South Wales NP19 4SU 25/0058	Reconstruction of a fire damaged portal framed building (retrospective)	Granted with Conditions	1.5km	2.8km
Llanwern Works Queensway Llanwern Newport South Wales NP19 4QZ 25/0052	Retention of engineering works and use of land as an open storage and distribution facility, with ancillary staff welfare/security/office space, along with the laying of roads/marshalling areas, the erection of new fencing and lighting and associated ground,	Granted with Conditions	4.3km	3.6km

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
	drainage, engineering and landscaping works			
Land Formerly Known As 21 Kelvedon Street Newport South Wales 24/0756	The construction of 30no affordable housing apartments and associated external works and parking	Granted subject to S106	0.25km	3.9km
Land East Of Lyte Buildings Road C Wern Industrial Estate Newport South Wales 24/0755	Change of use from sui generis to b8 self-storage facility	Awaiting decision	4.2km	6.5km
Celtic Technology Centre Celtic Way Celtic Lakes Newport South Wales NP10 8BE 24/0747	Construction of an electricity substation compound comprising transformers, switchgears and electrical equipment, surface water drainage, means of access, landscaping, the installation of buried electricity transmission circuits, creation of a habitat compensation site and associated works.	Granted with Conditions	3km	2.5km
Monbank Development Site Cardiff Road Newport South Wales 24/0678	Proposed development of 42 no. Dwellings, landscape planting and associated works	Awaiting decision	1.3km	2.9km
Land Adjacent To Llanbedr Court Chepstow Road Newport NP18 2AA 24/0548	Proposed equestrian centre	Awaiting decision	2.3km	7.7km
Quinn Radiators Celtic Way Celtic Lakes Newport NP10 8FS 24/0006	Demolition of remainder of existing principal building and remaining structures and construction of new datacentre (use class b8) across two main buildings plus ancillary structures and other associated works	Granted with Conditions	3.3km	3.1km

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
Land To South And West Of Cul De Sac At Marryat Walk Newport South Wales 23/1109	Proposed residential development of 20 apartments, landscape planting and associated works	Granted with Conditions	2.2km	3.8km
Land On The West Side Of Celtic Way Celtic Lakes Newport South Wales 23/0996	Construction of 2no. Units under use class b1, b2 & b8	Granted with Conditions	3.9km	3.5km
Land South Of Docks Way Disposal Site Docks Way Newport South Wales 23/0989	Proposed ground mounted solar development and associated works	Granted with Conditions	1.9km	1.7km
Land At Uskmouth Power Station West Nash Road Nash Newport South Wales 23/0949	Battery energy storage system with associated infrastructure and works	Granted with Conditions	0.05km	0.1km
Land To The South And East Of Celtic Way Celtic Lakes Newport South Wales 23/0878	Proposed electricity substation compound (132/33/11kv), including a switch-room building and outdoor electrical equipment, enclosed by a security fence, with associated infrastructure including access, landscaping, drainage and earthworks	Granted with Conditions	3.1km	2.9km
Celtic Technology Centre Celtic Way Celtic Lakes Newport NP10 8BE 23/0858	Provision of an underground electricity transmission circuit	Granted with Conditions	3.1km	2.9km
Tredegear House, Caravan Club Site Pencarn Way Duffryn Newport NP10 8TW	Redevelopment works which include upgrading 11no. Existing pitches to serviced pitches, upgrade of motor van waste point and service points. Extension to toilet block to	Granted with Conditions	3km	2.7km

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
23/0752	provide compliant accessible shower room and associated works including respacing of pitches to provide fire separation and siting of static caravan to provide on-site manager accommodation			
Land To North West Of Chartist Way Rogerstone Newport South Wales 23/0714	Proposed b8 commercial development with associated parking, access and external storage and service areas	Granted with Conditions	4.2km	6km
58 Stow Hill Newport NP20 1JG 23/0639	Conversion of existing buildings, raising height of roof of existing building and insertion of new dormers and construction of part 3 storey extension and part 1.5 storey extension to the rear to create 13no. Residential units (resubmission of 20/0996)	Granted with Conditions	0.4km	4km
Orb Works Stephenson Street Newport South Wales NP19 0RB 23/0477	Proposed class b1(c)/b2/b8 development (phase 1) together with associated demolition/elevational treatment, parking, landscaping, drainage, ecological enhancement and provision of improved pedestrian/cyclist facilities	Granted with Conditions	0.02km	2.3km
St Andrews Primary School Jenkins Street Newport NP19 0GR 23/0327	Construction of a 3-storey new teaching block incorporating junior teaching accommodation, ancillary facilities, and inclusion zone, and landscape reconfiguration	Granted with Conditions	0.3km	3.7km
Newport Export Packing Queens Hill Newport South Wales NP20 5HJ 23/0163	Residential development of 43 units	Granted with Conditions	0.25km	4.6km
Newport West Retail Park Docks Way Newport South Wales NP20 2NZ 23/0091	Demolition of existing retail park (class a1) and erection of 1 no. Retail unit (class a1) with associated access and serving arrangements and car parking	Granted with Conditions	0.5km	2.4km

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
Gwent Car Sales Crawford Street Newport NP19 7AY 22/1033	Demolition of existing buildings and the construction of 30no. Apartments along with associated parking and external areas (amended plans received)	Granted with Conditions	0.15km	4.9km
Land At North And South Site St John's Oak Road Rogerstone Newport South Wales 22/0919	Demolition of 1 - 23 oak road and redevelopment to provide 43 residential homes comprising 5 houses and 9 flats on the north site and 29 flats on the south site alongside landscaping, access, parking and associated works	Granted with Conditions	4.5km	6.5km
Uskmouth Power Station West Nash Road Nash Newport South Wales NP18 2BZ 22/0823	Installation of a 230 mw battery energy storage system (bess)	Granted with Conditions	0.1km	0.4km
The Ferns Club 57 Liswerry Road Newport NP19 4LG 22/0919	Demolition of public house and construction of 12no. Affordable apartments and 8no. Affordable houses together with associated car parking and amenity areas	Granted with Conditions	1.4km	4km
Land North Of Oaklands Gilvach Lane Llanvaches Newport South Wales 22/0350	Change of use of land to personal equestrian use and siting of a timber clad storage container with timber frame shelter	Granted with Conditions	3.6km	8.2km
Land From Rush Wall To Green Street At Longlands Lane Redwick Newport South Wales 20/0920	Installation of Solar Farm with an approximate design capacity of 75MW and ancillary electrical equipment, infrastructure, access tracks, security fencing and CCTV monitoring.		8.5km	1.1km
Land On The Caldicot Levels To The South Of The Llanwern Steelworks Site 18/0198	Erection of a renewable energy hub with a net installed generation capacity and maximum export to grid of 49.9MW comprising of up to 245,000 ground mounted solar panels battery storage container units (up to 200 units), underground cabling grid connection hub, associated		3.2km	1km

Location and reference	Description	Status	Approximate distance from	
			River Usk SAC	Severn Estuary SAC, SPA Ramsar Site
	infrastructure, landscaping and environmental enhancements.			
Newport Centre Kingsway Newport NP20 1UH 22/0814	Outline application for the demolition and redevelopment of the site for circa 54,000 square metres of flexible floorspace for educational use, or any other use within use classes a1 (shops), a2 (financial and professional services), a3 (food and drink), b1 (business), c1 (hotels), d1 (non-residential institutions) and d2 (assembly and leisure), with all matters reserved	Granted with Conditions	0.1km	4km

Appendix B – HRA Screening Matrices

Table 3: Screening matrix for Severn Estuary SAC

Project	Llanwern Hot Mill demolition
Designated site under consideration	Severn Estuary SAC
Date:	19/08/2025
Description of project	
Description of project	The site is located south of the town of Llanwern, Wales. The grid reference for the site is ST37688675. The project is the demolition of the Hot Mill building and surrounding structures at Tata steelworks in Llanwern.
Size and scale (road type and probable traffic volume)	The site is c. 32ha. Demolished materials will be regularly removed from site by lorry, which will vary depending on works schedule. The contractor anticipates 15 - 20 lorries a day and potentially up to 30 lorries at peak times. Lorries would use main roads, most anticipated to Newport docks (c. 6 miles west).
Land-take	No works to take place within the SAC and therefore no land take.
Distance from the designated site or key features of the site (from edge of the project assessment corridor)	The works are a minimum of 3.66 km from the SAC.
Resource requirements (from the designated site or from areas in proximity to the site, where of relevance to consideration of impacts)	No resource requirements are needed from within the SAC.
Emissions (e.g. polluted surface water runoff – both soluble and insoluble pollutants, atmospheric pollution)	Surface water, run-off from the Hot Mill roof and water pumped out from the Hot Mill basements is fed through a series of settling lagoons and oil catchment areas. Tata have a standard pollution prevention plan in the form of an Environmental permit with NRW (BS39051P). Where water treatment controls are in place, for example, continuous monitoring of certain parameters, daily sampling schedule, settling lagoons, oil catchment areas etc, to enable control of permitted discharges into the Severn Estuary. It is not a 'closed loop system'. These environmental controls would be in place for the duration of the demolition works to prevent any potential pollution entering into drains during works. Any contaminated waste would be removed from Site and disposed of appropriately. No significant atmospheric pollution. The contractor will use standard dust control measures throughout works.
Excavation requirements (e.g. impacts of local hydrogeology)	None
Transportation requirements	15-20 lorries per day
Duration of construction, operation, etc.	The normal working hours will be from 07:00 to 19:00 Monday to Friday as well as potential alternative weekend working (Saturday/Sunday) September 2025 for 36 months
Other	None
Description of avoidance and/or mitigation measures	
Describe any assumed (plainly established and uncontroversial) mitigation measures, including information on:	

Project	
Llanwern Hot Mill demolition	
Nature of proposal	Pollution prevention guidance will be followed during construction to avoid adverse impacts on local water quality.
Location	The works are a minimum of 3.66 km from the SAC.
Evidence for effectiveness	Legally required and widely accepted best practice. Permit already accepted by regulator.
Mechanism for delivery (legal conditions, restrictions or other legally enforceable obligations)	Water pollution measures are already secured through an Environmental Permit. It is expected that the contractor Method Statement and Project Environmental Plan will be submitted alongside this HRA report as part of the demolition notice application. The environmental measures within them will therefore form commitments under the notice.
Characteristics of designated site(s)	
A brief description of the designated site to be produced, including information on:	
Name of designated site and its EU code	Severn Estuary Special Area of Conservation (SAC), the EU code is UK0013030
Location and distance of the designated site from the proposed works	It's closest point on the boundary is 3.66km south of the site boundary.
Designated site size	The SAC is 73,714.11 Ha.
Key features of the designated site including the primary reasons for selection and any other qualifying interests	Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks, Estuaries, Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats, Reefs, Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>); <i>Petromyzon marinus</i> , Sea lamprey; <i>Lampetra fluviatilis</i> , River lamprey; <i>Alosa fallax</i> , Twaite shad.
Vulnerability of the designated site – any information available from the standard data forms on potential effect pathways	Vulnerabilities to habitats include substratum loss, smothering of features by sediment, changes in suspended sediment, Desiccation and changes in emergence regime, change in water flow rate, change in wave exposure, abrasion and physical disturbance, Changes in grazing management, toxic contamination, changes in nutrient loading, changes in thermal regime, changes in salinity, changes in oxygenation, introduction of microbial pathogens, introduction of non-native species and selective extraction of species. Additional vulnerabilities to species include noise and change in turbidity.
Designated site conservation objectives – where these are readily available	See section 4.2 above
Assessment criteria	
Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the designated site.	The assessment considers all construction activities from the project but none are likely to result in any impact on the designated site.
Initial assessment	
The key characteristics of the site and the details of the designated site to be considered in identifying potential impacts. Describe any likely changes to the site arising as a result of:	

Project	Llanwern Hot Mill demolition
Reduction of habitat	None
Disturbance of key species	None
Habitat or species fragmentation	None
Reduction in species density	None
Changes in key indication of conservation value (water quality, etc)	None. Water quality is and will continue to be managed through the project.
Climate change	None
Describe any likely impacts on the designated site as a whole in terms of:	
Interference with the key relationships that define the structure of the site	None
Interference with key relationships that define the function of the site	None
Indicate the significance as a result of the identification of impacts set out above in terms of:	
Reduction of habitat area	N/A
Disturbance of key species	N/A
Habitat or species fragmentation	N/A
Loss	N/A
Fragmentation	N/A
Disruption	N/A
Disturbance	N/A
Change to key elements of the site (e.g. water quality, hydrological regime etc.)	N/A
Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.	None
Outcome of screening stage (delete as appropriate).	Not likely to be significant effects
Are the appropriate statutory environmental bodies in agreement with this conclusion (delete as appropriate and attach relevant correspondence).	YES/NO

Table 4: screening matrix for Severn Estuary SPA

Project	Llanwern Hot Mill demolition
Designated site under consideration	Severn Estuary SPA
Date:	19/08/2025
Description of project	
Description of project	The site is located south of the town of Llanwern, Wales. The grid reference for the site is ST37688675. The project is the demolition of the Hot Mill building and surrounding structures at Tata steelworks in Llanwern.

Project	Llanwern Hot Mill demolition
Size and scale (road type and probable traffic volume)	The site is c. 32ha. Demolished materials will be regularly removed from site by lorry, which will vary depending on works schedule. The contractor anticipates 15 - 20 lorries a day and potentially up to 30 lorries at peak times. Lorries would use main roads, most anticipated to Newport docks (c. 6 miles west).
Land-take	No works to take place within the SPA and therefore no land take.
Distance from the designated site or key features of the site (from edge of the project assessment corridor)	The works are a minimum of 3.66 km from the SPA.
Resource requirements (from the designated site or from areas in proximity to the site, where of relevance to consideration of impacts)	No resource requirements are needed from within the SPA.
Emissions (e.g. polluted surface water runoff – both soluble and insoluble pollutants, atmospheric pollution)	Surface water, run-off from the Hot Mill roof and water pumped out from the Hot Mill basements is fed through a series of settling lagoons and oil catchment areas. Tata have a standard pollution prevention plan in the form of an Environmental permit with NRW (BS39051P). Where water treatment controls are in place, for example, continuous monitoring of certain parameters, daily sampling schedule, settling lagoons, oil catchment areas etc, to enable control of permitted discharges into the Severn Estuary. It is not a 'closed loop system'. These environmental controls would be in place for the duration of the demolition works to prevent any potential pollution entering into drains during works. Any contaminated waste would be removed from Site and disposed of appropriately. No significant atmospheric pollution. The contractor will use standard dust control measures throughout works.
Excavation requirements (e.g. impacts of local hydrogeology)	None
Transportation requirements	15-20 lorries per day
Duration of construction, operation, etc.	The normal working hours will be from 07:00 to 19:00 Monday to Friday as well as potential alternative weekend working (Saturday/Sunday) September 2025 for 36 months
Other	None
Description of avoidance and/or mitigation measures	
Describe any assumed (plainly established and uncontroversial) mitigation measures, including information on:	
Nature of proposal	Pollution prevention guidance will be followed during construction to avoid adverse impacts on local water quality.
Location	The works are a minimum of 3.66 km from the SPA.
Evidence for effectiveness	Legally required and widely accepted best practice. Permit already accepted by regulator.
Mechanism for delivery (legal conditions, restrictions or other legally enforceable obligations)	Water pollution measures are already secured through an Environmental Permit. It is expected that the contractor Method Statement and Project Environmental Plan will be submitted alongside this HRA report as part of the demolition notice application. The environmental measures within them will therefore form commitments under the notice.

Project	
Llanwern Hot Mill demolition	
Characteristics of designated site(s)	
A brief description of the designated site to be produced, including information on:	
Name of designated site and its EU code	Severn Estuary Special Protection Area (SPA), the EU code is UK9015022
Location and distance of the designated site from the proposed works	It's closest point on the boundary is 3.66km south of the site boundary.
Designated site size	The SPA is 24,701 Ha.
Key features of the designated site including the primary reasons for selection and any other qualifying interests	Bewick's swan (<i>Cygnus columbianus bewickii</i>) (Non-breeding), Common Shelduck (<i>Tadorna tadorna</i>) (Non breeding), Gadwall (<i>Anas strepera</i>) (Non-breeding), Dunlin (<i>Calidris alpina alpina</i>) (Non-breeding), Common redshank (<i>Tringa tetanus</i>) (Non-breeding) and Greater white-fronted goose (<i>Anser albifrons albifrons</i>) (Non-breeding). The site also has an internationally important assemblage of waterfowl.
Vulnerability of the designated site – any information available from the standard data forms on potential effect pathways	Vulnerabilities include substratum loss, smothering of features by sediment, changes in suspended sediment, Desiccation and changes in emergence regime, change in water flow rate, change in wave exposure, abrasion and physical disturbance, Changes in grazing management, noise and visual presence toxic contamination, changes in nutrient loading, changes in thermal regime, changes in salinity, changes in oxygenation, introduction of microbial pathogens, introduction of non-native species and selective extraction of species.
Designated site conservation objectives – where these are readily available	See section 4.3 above
Assessment criteria	
Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the designated site.	The assessment considers all construction activities from the project but none are likely to result in any impact on the designated site.
Initial assessment	
The key characteristics of the site and the details of the designated site to be considered in identifying potential impacts. Describe any likely changes to the site arising as a result of:	
Reduction of habitat	None
Disturbance of key species	None
Habitat or species fragmentation	None
Reduction in species density	None
Changes in key indication of conservation value (water quality, etc)	None. Water quality is and will continue to be managed through the project.
Climate change	None
Describe any likely impacts on the designated site as a whole in terms of:	
Interference with the key relationships that define the structure of the site	None

Project	Llanwern Hot Mill demolition
Interference with key relationships that define the function of the site	None
Indicate the significance as a result of the identification of impacts set out above in terms of:	
Reduction of habitat area	N/A
Disturbance of key species	N/A
Habitat or species fragmentation	N/A
Loss	N/A
Fragmentation	N/A
Disruption	N/A
Disturbance	N/A
Change to key elements of the site (e.g. water quality, hydrological regime etc.)	N/A
Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.	None
Outcome of screening stage (delete as appropriate).	Not likely to be significant effects
Are the appropriate statutory environmental bodies in agreement with this conclusion (delete as appropriate and attach relevant correspondence).	YES/NO

Table 5: screening matrix for Severn Estuary Ramsar

Project	Llanwern Hot Mill demolition
Designated site under consideration	Severn Estuary Ramsar
Date:	19/08/2025
Description of project	
Description of project	The site is located south of the town of Llanwern, Wales. The grid reference for the site is ST37688675. The project is the demolition of the Hot Mill building and surrounding structures at Tata steelworks in Llanwern.
Size and scale (road type and probable traffic volume)	The site is c. 32ha. Demolished materials will be regularly removed from site by lorry, which will vary depending on works schedule. The contractor anticipates 15 - 20 lorries a day and potentially up to 30 lorries at peak times. Lorries would use main roads, most anticipated to Newport docks (c. 6 miles west).
Land-take	No works to take place within the Ramsar and therefore no land take.
Distance from the designated site or key features of the site (from edge of the project assessment corridor)	The works are a minimum of 3.66 km from the Ramsar.
Resource requirements (from the designated site or from	No resource requirements are needed from within the Ramsar.

Project	
Llanwern Hot Mill demolition	
areas in proximity to the site, where of relevance to consideration of impacts	
Emissions (e.g. polluted surface water runoff – both soluble and insoluble pollutants, atmospheric pollution)	Surface water, run-off from the Hot Mill roof and water pumped out from the Hot Mill basements is fed through a series of settling lagoons and oil catchment areas. Tata have a standard pollution prevention plan in the form of an Environmental permit with NRW (BS39051P). Where water treatment controls are in place, for example, continuous monitoring of certain parameters, daily sampling schedule, settling lagoons, oil catchment areas etc, to enable control of permitted discharges into the Severn Estuary. It is not a 'closed loop system'. These environmental controls would be in place for the duration of the demolition works to prevent any potential pollution entering into drains during works. Any contaminated waste would be removed from Site and disposed of appropriately. No significant atmospheric pollution. The contractor will use standard dust control measures throughout works.
Excavation requirements (e.g. impacts of local hydrogeology)	None
Transportation requirements	15-20 lorries per day
Duration of construction, operation, etc.	The normal working hours will be from 07:00 to 19:00 Monday to Friday as well as potential alternative weekend working (Saturday/Sunday) September 2025 for 36 months
Other	None
Description of avoidance and/or mitigation measures	
Describe any assumed (plainly established and uncontroversial) mitigation measures, including information on:	
Nature of proposal	Pollution prevention guidance will be followed during construction to avoid adverse impacts on local water quality.
Location	The works are a minimum of 3.66 km from the Ramsar.
Evidence for effectiveness	Legally required and widely accepted best practice. Permit already accepted by regulator.
Mechanism for delivery (legal conditions, restrictions or other legally enforceable obligations)	Water pollution measures are already secured through an Environmental Permit. It is expected that the contractor Method Statement and Project Environmental Plan will be submitted alongside this HRA report as part of the demolition notice application. The environmental measures within them will therefore form commitments under the notice.
Characteristics of designated site(s)	
A brief description of the designated site to be produced, including information on:	
Name of designated site and its EU code	Severn Estuary Ramsar, the EU code is UK11081(67)
Location and distance of the designated site from the proposed works	It's closest point on the boundary is 3.66km south of the site boundary.
Designated site size	The Ramsar is 24,662.98 Ha.
Key features of the designated site including the primary	Estuaries,

Project	
Llanwern Hot Mill demolition	
reasons for selection and any other qualifying interests	Assemblage of migratory fish species (Sea Lamprey, River Lamprey, Twaite Shad, Allis Shad, Salmon, Sea Trout, Eel), Bewick's Swan, European white-fronted goose, Dunlin, Common Redshank, Common Shelduck, Gadwall, Internationally important populations of waterfowl.
Vulnerability of the designated site – any information available from the standard data forms on potential effect pathways	Vulnerabilities to habitats include substratum loss, smothering of features by sediment, changes in suspended sediment, Desiccation and changes in emergence regime, change in water flow rate, change in wave exposure, abrasion and physical disturbance, Changes in grazing management, toxic contamination, changes in nutrient loading, changes in thermal regime, changes in salinity, changes in oxygenation, introduction of microbial pathogens, introduction of non-native species and selective extraction of species. Additional vulnerabilities to species include noise or visual disturbance and change in turbidity.
Designated site conservation objectives – where these are readily available	See section 4.4 above
Assessment criteria	
Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the designated site.	The assessment considers all construction activities from the project but none are likely to result in any impact on the designated site.
Initial assessment	
The key characteristics of the site and the details of the designated site to be considered in identifying potential impacts. Describe any likely changes to the site arising as a result of:	
Reduction of habitat	None
Disturbance of key species	None
Habitat or species fragmentation	None
Reduction in species density	None
Changes in key indication of conservation value (water quality, etc)	None. Water quality is and will continue to be managed through the project.
Climate change	None
Describe any likely impacts on the designated site as a whole in terms of:	
Interference with the key relationships that define the structure of the site	None
Interference with key relationships that define the function of the site	None
Indicate the significance as a result of the identification of impacts set out above in terms of:	
Reduction of habitat area	N/A
Disturbance of key species	N/A
Habitat or species fragmentation	N/A

Project	Llanwern Hot Mill demolition
Loss	N/A
Fragmentation	N/A
Disruption	N/A
Disturbance	N/A
Change to key elements of the site (e.g. water quality, hydrological regime etc.)	N/A
Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.	None
Outcome of screening stage (delete as appropriate).	Not likely to be significant effects
Are the appropriate statutory environmental bodies in agreement with this conclusion (delete as appropriate and attach relevant correspondence).	YES/NO

Table 6: screening matrix for River Usk SAC

Project	Llanwern Hot Mill demolition
Designated site under consideration	River Usk SAC
Date:	19/08/2025
Description of project	
Description of project	The site is located south of the town of Llanwern, Wales. The grid reference for the site is ST37688675. The project is the demolition of the Hot Mill building and surrounding structures at Tata steelworks in Llanwern.
Size and scale (road type and probable traffic volume)	The site is c. 32ha. Demolished materials will be regularly removed from site by lorry, which will vary depending on works schedule. The contractor anticipates 15 - 20 lorries a day and potentially up to 30 lorries at peak times. Lorries would use main roads, most anticipated to Newport docks (c. 6 miles west).
Land-take	No works to take place within the SAC and therefore no land take.
Distance from the designated site or key features of the site (from edge of the project assessment corridor)	The works are a minimum of 4.25 km from the SAC.
Resource requirements (from the designated site or from areas in proximity to the site, where of relevance to consideration of impacts)	No resource requirements are needed from within the SAC.
Emissions (e.g. polluted surface water runoff – both soluble and insoluble)	Surface water, run-off from the Hot Mill roof and water pumped out from the Hot Mill basements is fed through a series of

Project	Llanwern Hot Mill demolition
pollutants, atmospheric pollution)	settling lagoons and oil catchment areas. Tata have a standard pollution prevention plan in the form of an Environmental permit with NRW (BS39051P). Where water treatment controls are in place, for example, continuous monitoring of certain parameters, daily sampling schedule, settling lagoons, oil catchment areas etc, to enable control of permitted discharges into the Severn Estuary. It is not a 'closed loop system'. These environmental controls would be in place for the duration of the demolition works to prevent any potential pollution entering into drains during works. Any contaminated waste would be removed from Site and disposed of appropriately. No significant atmospheric pollution. The contractor will use standard dust control measures throughout works.
Excavation requirements (e.g. impacts of local hydrogeology)	None
Transportation requirements	15-20 lorries per day
Duration of construction, operation, etc.	The normal working hours will be from 07:00 to 19:00 Monday to Friday as well as potential alternative weekend working (Saturday/Sunday) September 2025 for 36 months
Other	None
Description of avoidance and/or mitigation measures	
Describe any assumed (plainly established and uncontroversial) mitigation measures, including information on:	
Nature of proposal	Pollution prevention guidance will be followed during construction to avoid adverse impacts on local water quality.
Location	The works are a minimum of 4.25 km from the SAC.
Evidence for effectiveness	Legally required and widely accepted best practice. Permit already accepted by regulator.
Mechanism for delivery (legal conditions, restrictions or other legally enforceable obligations)	Water pollution measures are already secured through an Environmental Permit. It is expected that the contractor Method Statement and Project Environmental Plan will be submitted alongside this HRA report as part of the demolition notice application. The environmental measures within them will therefore form commitments under the notice.
Characteristics of designated site(s)	
A brief description of the designated site to be produced, including information on:	
Name of designated site and its EU code	River Usk SAC, the EU code is UK0013007
Location and distance of the designated site from the proposed works	It's closest point on the boundary is 4.25 km west of the site boundary.
Designated site size	The SAC is 967.97 Ha.
Key features of the designated site including the primary reasons for selection and any other qualifying interests	Sea lamprey (<i>Petromyzon marinus</i>), Brook lamprey (<i>Lampetra planeri</i>), River lamprey (<i>Lampetra fluviatilis</i>), Twaite shad (<i>Alosa fallax</i>), Allis shad (<i>Alosa alosa</i>), Atlantic salmon (<i>Salmo salar</i>), Bullhead (<i>Cottus gobio</i>), European otter (<i>Lutra lutra</i>),

Project	Llanwern Hot Mill demolition
	Watercourses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation.
Vulnerability of the designated site – any information available from the standard data forms on potential effect pathways	Vulnerabilities were not included in Core Management Plan but assessment of status and management requirements for features relate to water quality (including suspended solids and phosphate), abstraction and flow, barriers to migration, noise and vibration, visual disturbance (for otter) and risks from invasive species.
Designated site conservation objectives – where these are readily available	See section 4.5 above
Assessment criteria	
Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the designated site.	The assessment considers all construction activities from the project but none are likely to result in any impact on the designated site.
Initial assessment	
The key characteristics of the site and the details of the designated site to be considered in identifying potential impacts. Describe any likely changes to the site arising as a result of:	
Reduction of habitat	None
Disturbance of key species	None
Habitat or species fragmentation	None
Reduction in species density	None
Changes in key indication of conservation value (water quality, etc)	None. Water quality is and will continue to be managed through the project.
Climate change	None
Describe any likely impacts on the designated site as a whole in terms of:	
Interference with the key relationships that define the structure of the site	None
Interference with key relationships that define the function of the site	None
Indicate the significance as a result of the identification of impacts set out above in terms of:	
Reduction of habitat area	N/A
Disturbance of key species	N/A
Habitat or species fragmentation	N/A
Loss	N/A
Fragmentation	N/A
Disruption	N/A
Disturbance	N/A
Change to key elements of the site (e.g. water quality, hydrological regime etc.)	N/A
Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale or	None

Project	Llanwern Hot Mill demolition
magnitude of impacts is not known.	
Outcome of screening stage (delete as appropriate).	Not likely to be significant effects
Are the appropriate statutory environmental bodies in agreement with this conclusion (delete as appropriate and attach relevant correspondence).	YES/NO



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