



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

HRA Screening Report for Nutrient Inputs in Relation to Marine Special Areas of Conservation (SACs) and Protected Areas (SPAs)

Conservation of Habitats and Species Regulations 2017 (As Amended)

PURPOSE OF THIS REPORT

This Habitats Regulations Assessment (HRA) Screening Report has been prepared by Neath Port Talbot (NPT) Borough Council to evaluate whether a proposed project (or plan) is likely to have a significant effect, alone or in combination, on marine Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) relevant to NPT (and that of neighbouring counties), in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

This screening forms the initial stage of the HRA process and determines if a full Appropriate Assessment (AA) is required. In undertaking this screening, the authority has considered the most recent conservation advice and updated marine condition assessments¹ published by Natural Resources Wales (NRW) in June 2025, which identify a number of marine SAC features in Wales as being in unfavourable condition, partly due to nutrient enrichment and associated water quality pressures.

As set out in the interim advice letter published on the 25th July by NRW, the condition assessments showed that the nutrient sensitive features in Pembrokeshire Marine, Carmarthen Bay and Estuaries and Cemlyn Bay Special Areas of Conservation (SAC) areas are in unfavourable condition for Dissolved Inorganic Nitrogen and biological indicators (phytoplankton and opportunistic macroalgae) related to nutrient enrichment. Water bodies in marine SACs where features are in unfavourable condition due to current evidence of both chemical and biological failure are:

- Milford Haven Inner (Pembrokeshire Marine SAC)
- Burry Inlet Inner (Carmarthen Bay and Estuaries SAC)
- Cemlyn Lagoon (Cemlyn Bay SAC)

This HRA screening exercise ensures that decision-making remains precautionary and consistent with legal requirements, proportionate to risk, and informed by the best available scientific evidence and conservational advice.

CHARACTERISATION OF MARINE NATIONAL SITE NETWORK SITES

¹ [Natural Resources Wales / Condition Assessments for Welsh European Marine Sites \(EMS\)](#) (both site-level and feature-level reports)

The designated features for each relevant site have been identified below and colour coded dependent on the findings of the appropriate condition assessment (i.e., **Unfavourable**, **Favourable**, or **Unassessed/Unknown**).

CARMARTHEN BAY AND ESTUARIES SAC (UK0020020)	
The Annex I habitat features and Annex II species that are a primary reason for selection of this site are	• Estuaries • Mudflats and sandflats not covered by seawater at low tide • Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) • Large shallow inlets and bays • Sandbanks which are slightly covered by sea water all the time • Allis shad <i>Alosa alosa</i> • Twaite shad <i>Alosa fallax</i> • Salicornia and other annuals colonising mud and sand
Annex I habitats and Annex II species present as a qualifying feature, but not a primary reason for site selection	• River lamprey <i>Lampetra fluviatilis</i> • Sea lamprey <i>Petromyzon marinus</i> • Otter <i>Lutra lutra</i>

CARMARTHEN BAY SPECIAL PROTECTION AREA (UK9014091)	
Annex II species that are a primary reason for selection of this site are:	• Common scoter <i>Melanitta nigra</i>

As updated in June 2025, advice provided by NRW in fulfilment of Regulation 37(3) of the Conservation of Habitats and Species Regulations 2017 for each site can be found here:

- [NRW Conservation Advice For Carmarthen Bay and Estuaries SAC](#)
- [NRW Conservation Advice For Carmarthen Bay SPA](#)

Nutrient and Sediment Impacts

Natural Resources Wales' June 2025 marine conservation advice identifies Dissolved Inorganic Nitrogen (DIN) as the principal pressure currently affecting the condition of marine Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in Carmarthen Bay.

Excess nitrogen in coastal waters drives the growth of opportunistic macroalgae. This results in the smothering of intertidal mudflats and soft sediment habitats, reducing the abundance and accessibility of invertebrate prey essential to overwintering bird populations and estuarine fish features. This process is a key driver of unfavourable condition in Carmarthen Bay and Estuaries SAC, Burry Inlet SPA, and Carmarthen Bay SPA.

SCREENING FOR NUTRIENT INPUTS

Planning reference:	P2026/0279
Site Name:	Heol Y Gors, Cwmgors
Description of development:	Extension
SAC/SPA Estuary catchment	Carmarthenshire Bay & Estuaries SAC and Carmarthen Bay SPA

For development proposals within the catchment for nutrient sensitive marine Special Area of Conservation (SAC) requiring nitrogen neutrality.

Nutrient inputs: NRW have advised that the following types of development are unlikely to increase nutrient inputs. If they are not able to be screened out, then an appropriate assessment will be required to be undertaken by a Planning Ecologist.

	Type of development - NRW criteria:	Relevant information:	Criterion Example	Comments / observations:	Criterion satisfied: Yes/No/ N/A
1.	Any development that does not increase the volume or concentration of wastewater;	Provide confirmation that there is no additional wastewater generation or nutrient loading (e.g. same occupancy, no new foul sources).	<i>A rear conservatory extension to an existing dwelling with no new bathrooms, bedrooms, or increase in occupancy.</i>		Y

		Applies to minor non-residential changes, external works, or residential extensions not increasing occupancy or services Applies to non-domestic development or tourism schemes for minor refurbishments, internal alterations, or use changes where foul load remains the same. Particularly relevant for tourism proposals such as glamping pods, static caravans, with no increase in wastewater.			
2	Development to an existing residential property (e.g. extensions) that does not result in the creation of independent living accommodation, a separate planning unit and/or a change in use, where it can no longer be said to be ancillary to the main residence. (e.g. extensions)	Evidence that development is ancillary to main dwelling (e.g. conservatory, porch, garage, replacement with no uplift), and does not create independent accommodation. If new independent accommodation could result in increased occupancy (e.g. annex or Airbnb), further screening may be required. See Section 8 of NRW Phosphate Guidance.	<i>A domestic garage or porch extension with no kitchen or bathroom, remaining clearly ancillary to the main dwelling and not capable of being used as independent accommodation.</i>		Y
3.	Any development which improves existing water quality discharges by	Demonstrate that development reduces existing wastewater flows or nutrient concentration	<i>Retrofit of an existing holiday let to install low flush toilets, water saving</i>		N/A

	reducing the nutrient load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure);	(e.g. via improved treatment infrastructure, roof separation, water saving measures). Consider for upgrades to existing facilities or infrastructure retrofits with quantifiable environmental benefit.	<i>taps, and a new treatment plant that reduces nutrient discharge compared to the existing septic tank.</i>		
4.	Any developments intended to provide services, facilities, commercial sites, or places of employment for a local population already served by residential connections to existing public or private sewers discharging within the SAC catchment (e.g., community buildings, schools etc.)	Confirm that the development does not increase overnight accommodation, visitor numbers, or foul water discharge (e.g. boarding school, church, hall, or campsite with no uplift in use or capacity).	Replacement of school serving the same number of pupils/staff and the same school catchment.		N/A
5.	Any development connecting to a public wastewater treatment works with known capacity, compliance and permits	Provide written confirmation from Dŵr Cymru Welsh Water and/or NRW that: a) The WwTW discharges into the inner Burry Inlet or is within the catchment that is hydrologically connected which has a valid environmental permit for ammoniacal N, Flow Passed Forward, Dry Weather Flow; b) The WwTW is compliant	<i>A single dwelling connecting to a WwTW, where Dŵr Cymru has confirmed compliance with ammoniacal N permit limits and available capacity.</i>		N/A

		with those permits; c) There is sufficient treatment capacity to accept the proposed load without leading to an increase in the environmental impact of storm overflows; d) Discharge will not increase DIN levels. Required for all development proposing connection to sewer in a marine SAC/SPA catchment. Must identify treatment works, discharge location, and capacity status. See Section 9 of NRW Phosphate guidance			
	Any development connecting to a Private treatment Plant (PTP) or Septic Tank in line with Circular 008/2018	Private sewage treatment systems discharging domestic wastewater to ground that are: 1) Built to the relevant British Standard (BS 6297:2007+A1:2008) 2) Where the maximum daily discharge rate is less than 2 cubic metres (m³), 3) The drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain. 4) The drainage field is located more than 50m from a SAC boundary.			N/A

		5) To ensure that there is no significant in combination effect, the discharge to ground must be at least 200m from any other discharge to ground 6) where percolation testing results have been submitted and are satisfactory.			
6.	Any development that reduces the frequency, or volume of irregular discharges within a SAC catchment. (e.g. Agri) Note that any such development must not be linked to an increase in livestock numbers or the capacity for an increase in livestock numbers through provision of additional infrastructure	Evidence that development includes: a) Yard covers or roofed storage to separate clean/dirty water b) Redirection of clean water away from slurry/manure c) Measures not linked to increased livestock numbers or intensification May apply to farmyard and agricultural infrastructure upgrades and drainage schemes to separate rainwater from manures/slurries or cover pits and stores , yard roofing, or proactive mitigation. Check for absence of new livestock housing or expansion. See Section 6 of NRW Phosphate Guidance	<i>A farmyard improvement scheme that adds a roof over an existing manure store and installs clean water diversion drains, with no increase in livestock numbers or housing.</i>		N/A
7.	Any developments that include separator (compost) toilets	Separator toilets, also known as compost toilets, are unlikely to lead to increases in nutrient discharges to the SAC river	<i>Permanent separator toilets are appropriate for remote, small scale, low use sites. Permanent sites</i>		N/A

		environment. Well-designed and maintained separator toilets can reduce water usage and provide material that is suitable for use as a fertiliser. The design of both permanently sited and portable separator toilets should separate the urine and sanitary waste from the solids. Any temporary or compost type toilet that does not separate solids and liquids is a cesspool and should have the resultant waste collected by a registered waste carrier for treatment at an appropriately permitted site and should not be applied to land.	<i>with high use such as activity venues should seek to connect to a public sewer or install a permanent, private treatment system.</i>		
Neath Port Talbot County Borough Council concludes that:			If you have answered yes to the above questions, you can screen out. If no proceed to Appropriate Assessment. Increases in nutrient inputs in the Carmarthen Bay & Estuaries SAC and Carmarthen Bay SPA can be ruled out as a result of this development proposal.		
<u>Where increases in nutrient inputs in the SAC can be ruled out as a result of this development, the following wording is to be added to any decision record:</u> The proposal is for an extension to the existing living space, not bedrooms, so there will be no increase in nutrient inputs.					

This application has been screened in accordance with Natural Resources Wales' interim advice to Chief Planners dated 25th July 2025. It is considered that this development is unlikely to have a likely significant effect on the Marine SAC as the following criterion applies:

1 and 2

~~Further information is required to establish if the criterion above can be met.~~

Completed by	Lewis Badham	Ecologist (Planning)	01/06/2026
Checked by	Lowri Jones	Planning Officer	01/06/2026

If we have concluded that there is a likely significant effect then we will not consider other ecological matters at this stage.