

WFD Compliance Assessment

OGN 72 Appendix 2 WFD Compliance Assessment template

- In completing this template for a WFD compliance assessment, refer to OGN72 ([link](#)) for definitions, processes and further links to useful websites.

If there are any problems or issues with the information in this desk instruction, you must report it to the responsible Manager Team member named as the owner and guidance.development@cyfoethnaturiolcymru.gov.uk

Version History

Document Version	Date Published	Summary of Changes	Authorised by
1	September 2020	Document created and ready for trialling	
Review Date: [Month & Year]			

WFD Compliance Assessment template

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Stage 1

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Conclusion of WFD Compliance Assessment & Authorisation

Consultation with technical advisors/specialists

Figure 1: Stage 1 Screening

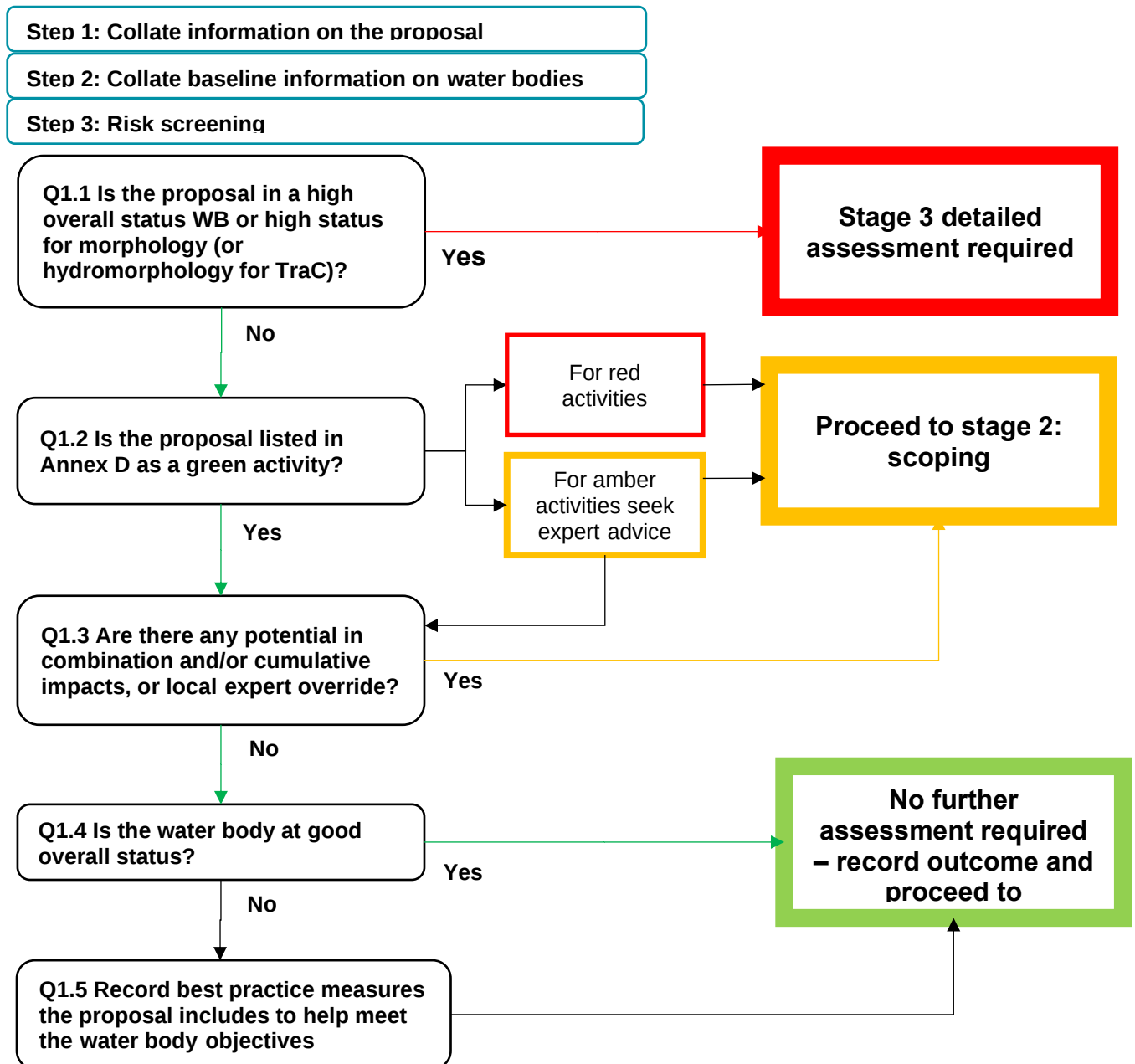
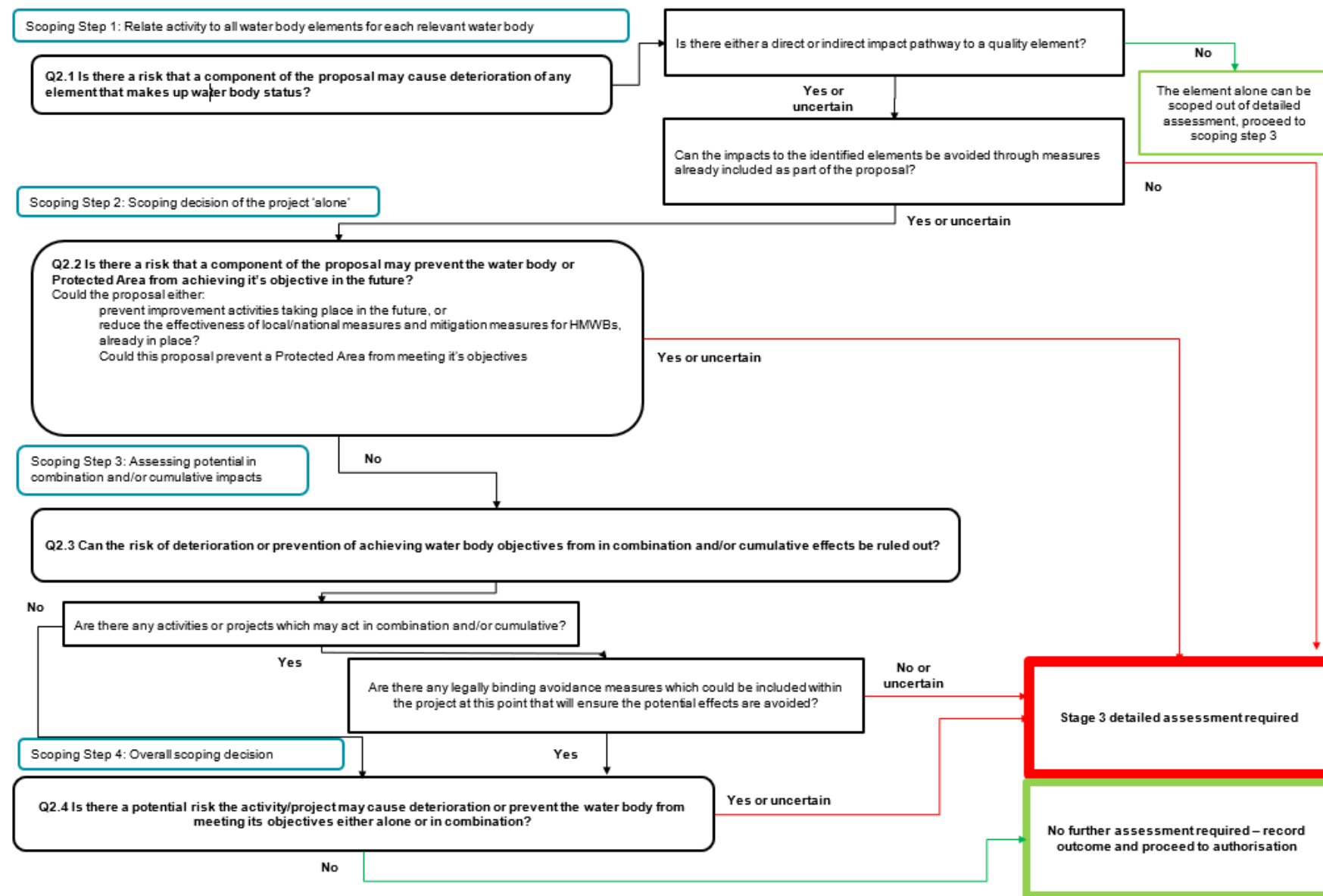


Figure 2: Stage 2 Scoping



WFD Compliance Assessment

Stage 1 step 1: proposal details.

a): Project details where an <u>external party</u> has applied to NRW for any form of authorisation		
Project details	Application reference number (if applicable)	DEML2248v2
	Date application received	01/08/2022 (duly made 10/08/2022) Variation 1 20/12/2023 Variation 2 30/05/2024
	Applicant details	Project Seagrass
	Activity proposed	The project proposes to plant seagrass over an area of 10 hectare within a search area that covers 7 sites in the shallow coastal water areas of the Llyn Peninsula and Anglesey. Variation 1 Previously, seed bags were deposited from a slow-moving vessel however, the methodology has now been updated to include the use of two sleds for seagrass planting, which either inject seagrass seeds into the sediment or bury seed packages (biodegradable bags of seeds or seed balls). When it is towed, the sled opens shallow furrows (the depth can be adjusted based on local sediment conditions), into which the seeds are injected through a peristaltic pump operated from the boat, and the furrow is closed again afterwards. The sled is 1 metre in width. The planting depth is a few centimetres and can be adjusted based on local sediment conditions. Variation 2 Add the use of a self-propelled underwater robot (a Remotely Operated Vehicle, i.e. ROV) which can plant seagrass seeds and transplants into the seabed. The robot does not need to be towed as it has its own propulsion and electronically injects seagrass seeds and transplants into the seabed as instructed from surface control.
	Relevant legislation	Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
	List other permissions that	N/A

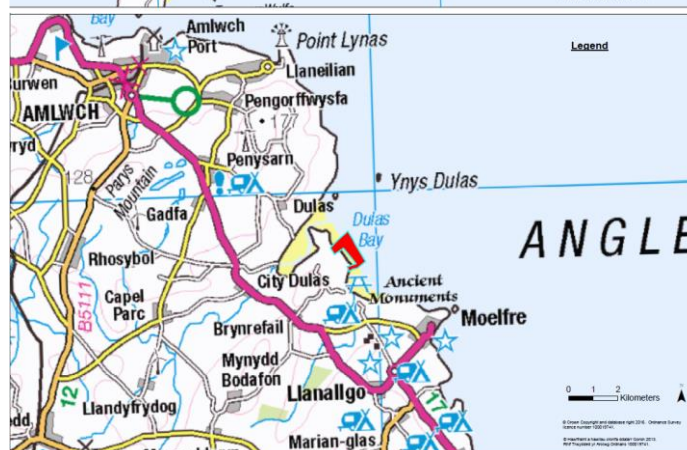
may be required where known

As appropriate: 6 sites are located on Llyn Peninsula and 1 site on Anglesey. The sites are Abersoch, Warren (between Abersoch and Llanbedrog), Y Gamlas, Pwllheli, two sites at Pen-Y-Chain, and Traeth yr Ora

Centroids of seagrass search areas

Site name	Latitude	Longitude
Abersoch	52.81159155	-4.489611885
Warren	52.84158408	-4.485197335
Y Gamlas	52.86756318	-4.459700659
Pwllheli	52.89345695	-4.389954436
Pen Y Chain	52.90262179	-4.319900608
Pen Y Chain2	52.90783240	-4.300337871
Traeth yr Ora	53.37265169	-4.266003876

Location (include map where appropriate)



Application documents

Include: Project purpose and background, site map, scaled plan, site photographs and working method statement.

DEML2248 0_MarineLicense-Band2-Application-combined, which includes:

- Marine License Band 2 application: continuation of sections 6(a), 6(b), 7(a).
- Digimaps (Ordnance Survey) of the 7 proposed seagrass search areas.
- Habitats Regulations Assessment
- Water Framework Directive Assessment
- Biosecurity Assessment & Management 1
- Biosecurity Assessment & Management 2
- Policy context of seagrass restoration in Wales

	- Correspondence with NRW - Letters of support: - AONB officer – Bleddyn Jones - PLAS SAC officer – Alison Hargrove - NRW Planning Team Leader – Dr. Jasmine Sharp - Isle of Anglesey County Council AONB Team - Christian Branch - Pwllheli Town Council Member – Iwan Edgar
Environmental Statement	N/A
List ongoing maintenance requirements. All structures will require maintenance	N/A
Timing of works	01 December 2022 to 30 November 2027
Pre-application correspondence	Natasha Lough, Natural Resources Wales Katherine Griffith, Natural Resources Wales Correspondence attached to the application form
Are the works located within a WFD waterbody? Or do they have the potential to impact upon a WFD water body? Waterbodies include surface waters (rivers, lakes, transitional waters, and coastal waters out to 1 nautical mile) and groundwaters	The works are located within a water body
NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Jack Thompson Marine Licensing Team
Date of assessment	15/01/2024

Refer to [Annex A for internal works](#) and [Annex B for Permitting](#), these include flow charts to help you work through the process.

Stage 1, step 2: Collate baseline information on all water bodies at risk from the proposal.

Date of classification information: 2021

WB ID	Water body name	WB type	Management catchment	HMWB	Overall water body status	Ecological status	Chemical status	Hydro-morphology status*	Relevance to the proposal
GB641010620000	Anglesey North	Coastal	Western Wales	No	Moderate	Good	Moderate	High	In the water body
GB651009350000	Tremadog Bay	Coastal	Western Wales	No	Good	Good	High	High	In the water body

**where there is no information, or a null value then assume it is at good status for morphology (or hydromorphology for TraC water bodies)

The potential for the proposal to affect the following water bodies was also initially considered, but can be ruled out without further consideration:

Stage 1, Step 3: Risk Screening

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.1	Is the proposal in a water body at high status or high status for morphology or hydromorphology?	N/A	No – go to Q1.2
Q1.2	Is the activity listed in Annex D as a green activity? Complete new row for each activity		No – complete scoping assessment for each water body

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.3	Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?	No	Yes – complete scoping assessment for each water body No – go to Q1.4
Q1.4	Is the water body at Good overall status?	Yes/No	Yes, no further WFD assessment needed – Go to Authorisation No – Go to Q1.5
Q1.5	Record best practice measures that the works include to help achieve the objectives of the water body.	Include all measures then proceed to Authorisation section For example, a biosecurity plan to ensure the project/activity doesn't introduce or spread Invasive Non Native Species.	

*Expert judgement may be required i.e. for complex or cumulative interactions; or a particularly sensitive site/activity (including target water bodies).

Stage 2: Scoping Assessment for: Anglesey North (GB641010620000) and Tremadog Bay (GB651009350000)

Each component of the works should be included, for example: a hydropower scheme may include in-channel impoundment, creation of depleted reach, and bank reinforcement for turbine house. Include vegetation removal/management as a scheme component. Where there is a lack of confidence on whether there is potential risk to an element then these should be scoped in for further assessment.

Stage 2, step 1 – relate activity to all water body elements for each relevant water body

Scoping table for Transitional and Coastal water bodies			
Water body name: Anglesey North Water body ID: GB641010620000			
Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
Transitional and Coastal water bodies	Choose one of the following: Direct – risk of direct impact Indirect – risk of indirect impact N/A – no impact pathway N/A – other – include additional text to explain	Further detail on potential impacts. Where N/A is included then provide detail to explain.	Colour text in green if all impacts can be avoided through measures already included in the scheme. Or red for schemes which require detailed assessment
Hydromorphology – hydromorphology constitutes both ‘hydrology’ and ‘geomorphology’ and describes the physical characteristics and processes of a water body. Could the proposal lead to changes in:			
morphological conditions, for example depth variation, the seabed and intertidal zone structure	N/A – no impact pathway		
tidal patterns, for example, dominant currents	N/A – no impact pathway		

Scoping table for Transitional and Coastal water bodies

Water body name: Anglesey North

Water body ID: GB641010620000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
• freshwater flow	N/A – no impact pathway		
• wave exposure	N/A – no impact pathway		
Is the proposal in a HMWB?	No		
Water quality An activity can modify the flow of water, introduce artificial materials or remove sediment and/or vegetation. These can all affect the water quality – particularly physico-chemical aspects of water quality - such as levels of dissolved oxygen, nutrients and ammonia.			
Include water quality in the detailed assessment if the activity could affect:			
• water clarity (turbidity or suspended particulate matter concentration)	N/A – no impact pathway	Positive impact	
• thermal conditions (including shading)	N/A – no impact pathway		
• oxygen levels – dissolved oxygen conditions	N/A – no impact pathway	Positive impact	
• nutrients - dissolved inorganic nitrogen	N/A – no impact pathway	Positive impact	
• microbial patterns	N/A – no impact pathway		
• salinity/conductivity	N/A – no impact pathway		
• is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad	No		
• is in a water body with a history of harmful algae (where there is an existing designation for the area, information should be available;	No		

Scoping table for Transitional and Coastal water bodies

Water body name: Anglesey North

Water body ID: GB641010620000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
however, local water quality officers will be able to help).			
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
chemicals are on the Environmental Quality Standards Directive (EQSD) list	No		
activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	No		
or, if the activity releases chemicals on the EQSD list and has a mixing zone, like a discharge pipeline or outfall, follow the Environment Agency's surface water pollution risk assessment guidance. This is part of the Environmental Permitting Regulations guidance.	No		
Biology Identify if the activity or project could impact on the abundance or composition of the biological elements listed below: Biological elements for transitional (T) and coastal (C) waters under the directive are: - Benthic invertebrates (T, C) - Fish (T) - Phytoplankton (T, C) - Macroalgae (T, C) - Angiosperms (T, C)			
Could the proposal lead to:			
changes to the composition and abundance of aquatic flora	Yes	The project will be having a positive impact by planting angiosperms in the WB	

Scoping table for Transitional and Coastal water bodies

Water body name: Anglesey North
Water body ID: GB641010620000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
changes to the composition and abundance of benthic invertebrate fauna	Yes	The project will be having a positive impact by planting angiosperms and improving habitat for benthic invertebrates in the WB	
For TraC water bodies - scope in if the footprint (where footprint can be direct or a plume i.e. chemical or thermal; for dredging multiply the area by 1.5x) of your activity is:			
0.5km² or larger	No		
1% or more of the water body's area	No		
Within 500m of any higher sensitivity habitat (see table below)	No	Any impacts are seen to be positive in terms of habitat provision	
1% or more of any lower sensitivity habitat (see table below)	No	Any impacts are seen to be positive in terms of habitat provision	
Fish fauna (Transitional water bodies only): could the proposal lead to:			
changes to the composition, abundance and age structure of fish fauna	No	Any impacts are seen to be positive in terms of habitat provision	
an impact on normal fish behaviour like movement, migration or spawning (for example creating a physical barrier, noise, chemical change or a change in depth or flow)	No	Any impacts are seen to be positive in terms of habitat provision	
entrainment or impingement of fish	No	Any impacts are seen to be positive in terms of habitat provision	
refuge/predation areas	No	Any impacts are seen to be positive in terms of habitat provision	
Or: is the proposal in an estuary and could affect fish in the estuary; is outside the estuary but could delay or prevent fish entering it; or, could affect fish migrating through the estuary	No		

Scoping table for Transitional and Coastal water bodies

Water body name: Tremadog Bay
Water body ID: GB651009350000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
Transitional and Coastal water bodies	Choose one of the following: Direct – risk of direct impact Indirect – risk of indirect impact N/A – no impact pathway N/A – other – include additional text to explain	Further detail on potential impacts. Where N/A is included then provide detail to explain.	Colour text in green if all impacts can be avoided through measures already included in the scheme. Or red for schemes which require detailed assessment
Hydromorphology – hydromorphology constitutes both ‘hydrology’ and ‘geomorphology’ and describes the physical characteristics and processes of a water body. Could the proposal lead to changes in:			
• morphological conditions, for example depth variation, the seabed and intertidal zone structure	N/A – no impact pathway		
• tidal patterns, for example, dominant currents	N/A – no impact pathway		
• freshwater flow	N/A – no impact pathway		
• wave exposure	N/A – no impact pathway		
Is the proposal in a HMWB?	No		
Water quality An activity can modify the flow of water, introduce artificial materials or remove sediment and/or vegetation. These can all affect the water quality – particularly physico-chemical aspects of water quality - such as levels of dissolved oxygen, nutrients and ammonia.			
Include water quality in the detailed assessment if the activity could affect:			
• water clarity (turbidity or suspended particulate matter concentration)	N/A – no impact pathway	Positive impact	

Scoping table for Transitional and Coastal water bodies

Water body name: Tremadog Bay

Water body ID: GB651009350000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
thermal conditions (including shading)	N/A – no impact pathway		
oxygen levels – dissolved oxygen conditions	N/A – no impact pathway	Positive impact	
nutrients - dissolved inorganic nitrogen	N/A – no impact pathway	Positive impact	
microbial patterns	N/A – no impact pathway		
salinity/conductivity	N/A – no impact pathway		
is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad	No		
is in a water body with a history of harmful algae (where there is an existing designation for the area, information should be available; however, local water quality officers will be able to help).	No		
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
chemicals are on the Environmental Quality Standards Directive (EQSD) list	No		
activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	No		
or, if the activity releases chemicals on the EQSD list and has a mixing zone, like a discharge pipeline or	No		

Scoping table for Transitional and Coastal water bodies

Water body name: Tremadog Bay

Water body ID: GB651009350000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
outfall, follow the Environment Agency's surface water pollution risk assessment guidance . This is part of the Environmental Permitting Regulations guidance .			
Biology Identify if the activity or project could impact on the abundance or composition of the biological elements listed below: Biological elements for transitional (T) and coastal (C) waters under the directive are: • Benthic invertebrates (T, C) • Fish (T) • Phytoplankton (T, C) • Macroalgae (T, C) • Angiosperms (T, C) Could the proposal lead to:			
• changes to the composition and abundance of aquatic flora	Yes	The project will be having a positive impact by planting angiosperms in the WB	
• changes to the composition and abundance of benthic invertebrate fauna	Yes	The project will be having a positive impact by planting angiosperms and improving habitat for benthic invertebrates in the WB	
For TraC water bodies - scope in if the footprint (where footprint can be direct or a plume i.e. chemical or thermal; for dredging multiply the area by 1.5x) of your activity is:			
• 0.5km ² or larger	No		
• 1% or more of the water body's area	No		
• Within 500m of any higher sensitivity habitat (see table below)	No	Any impacts are seen to be positive in terms of habitat provision	
• 1% or more of any lower sensitivity habitat (see table below)	No	Any impacts are seen to be positive in terms of habitat provision	
Fish fauna (Transitional water bodies only): could the proposal lead to:			

Scoping table for Transitional and Coastal water bodies

Water body name: Tremadog Bay
Water body ID: GB651009350000

Elements	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
changes to the composition, abundance and age structure of fish fauna	No	Any impacts are seen to be positive in terms of habitat provision	
an impact on normal fish behaviour like movement, migration or spawning (for example creating a physical barrier, noise, chemical change or a change in depth or flow)	No	Any impacts are seen to be positive in terms of habitat provision	
entrainment or impingement of fish	No	Any impacts are seen to be positive in terms of habitat provision	
refuge/predation areas	No	Any impacts are seen to be positive in terms of habitat provision	
Or: is the proposal in an estuary and could affect fish in the estuary; is outside the estuary but could delay or prevent fish entering it; or, could affect fish migrating through the estuary	No		

Info for TraC water bodies

Extract from EA Clearing the water for All

Higher and lower sensitivity habitats for TraC water bodies

Higher sensitivity habitats ²	Lower sensitivity habitats ³
chalk reef	cobbles, gravel and shingle
clam, cockle and oyster beds	intertidal soft sediments like sand and mud
intertidal seagrass	rocky shore
maerl	subtidal boulder fields
mussel beds, including blue and horse mussel	subtidal rocky reef
polychaete reef	subtidal soft sediments like sand and mud
saltmarsh	

Higher sensitivity habitats ²	Lower sensitivity habitats ³
subtidal kelp beds	
subtidal seagrass	

² Higher sensitivity habitats have a low resistance to, and recovery rate, from human pressures.

³ Lower sensitivity habitats have a medium to high resistance to, and recovery rate from, human pressures.

Invasive Non-Native Species Refer to the Check Clean Dry campaign to help prevent the spread of invasive plants and animals in British waters. You can find out more about INNS on the GB Non-native Species Secretariat website			
Risks of introducing or spreading INNS include: • materials or equipment that have come from, had use in or travelled through other water bodies • activities that help spread existing INNS, either within the immediate water body or to other water bodies			
Does the activity or project have the potential to introduce or spread INNS to a water body?			
Add in each relevant WB ID Use a separate row for each WB ID	Applicable	Potential Impact (include direct and indirect potential impacts)	Avoidance measures (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
	Choose one of the following: Direct – risk of direct impact Indirect – risk of indirect impact N/A – no impact pathway N/A – other – include additional text to explain	Further detail on potential impacts. Where N/A is included then provide detail to explain.	Colour text in green if all impacts can be avoided through measures already included in the scheme. Or red for schemes which require detailed assessment
Anglesey North (GB641010620000)	Direct	There is a risk of introducing INNS through planting and by the use of equipment	Biosecurity plan has been produced – see attached application form with Biosecurity Assessment and Management 1 and 2 documents. Working in line with the Biosecurity Risk Assessment will be secured through conditions within the licence.
Tremadog Bay (GB651009350000)	Direct	There is a risk of introducing INNS through planting and by the use of equipment	Biosecurity plan has been produced – see attached application form with Biosecurity Assessment and Management 1 and 2 documents. Working in line with the Biosecurity Risk Assessment will be secured through conditions within the licence.

WFD Protected Areas

If the proposed activity is within, or hydrologically connected to, a WFD Protected Area. If the activity is hydrologically linked, then as a general rule those Protected Areas within 2 km of the proposed activity will be most at risk.

Protected Areas and Critical sensitive habitats/species		
Consider if WFD protected areas are at risk from your activity. These include:	Applicable	How have you considered the potential impacts?
Protected Areas:		
• SACs/SPAs/RAMSAR	Yes	HRA has been undertaken for the activity
• Bathing Waters		
• Shellfish Waters		
• Nitrate Vulnerable Zones		
Other Protected and Priority habitats and species.		
• Nationally or locally protected areas e.g. SSSI, NNR etc		N/A
Section 6 Biodiversity and resilience of ecosystems duty (Environment (Wales) Act 2016) here - other Protected and Priority habitats and species. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.		
Identify if there is a risk that the activity/project could impact on a water dependant priority habitat and or species which are either critical to the ecological health of the water body or sensitive to changes proposed on the water body.		
• Section 7 list of priority habitats e.g. wetlands	Yes	Positive impacts only
• Section 7 list of priority species e.g. water voles		
Ecosystem Resilience		
The Environment (Wales) Act 2016, Section 3 states that the objective of the sustainable management of natural resources is to maintain and enhance the resilience of ecosystems and the benefits they provide now and for future generations		
Consideration of ecosystem resilience – diversity, extent, condition, connectivity.	Yes	Positive impacts only

Stage 2, step 2: Scoping decision of the project 'alone'

Scoping assessment	Scoping decisions
Q2.1 Is there a risk that a component of the proposal may cause deterioration of any element that makes up water body status?	<i>No, impacts will be mostly positive. The only risk is the introduction of INNS which has been mitigated through a Biosecurity Risk Assessment</i>
Q2.2 Is there a risk that a component of the proposal may prevent the water body or Protected Area from achieving its objectives in the future?	<i>No, impacts will be mostly positive. The only risk is the introduction of INNS which has been mitigated through a Biosecurity Risk Assessment</i>

Stage 2, step 3: Assessing potential in combination and/or cumulative impacts

It is important to consider the in combination and/or cumulative effects of pressures in a water body and the combined impacts of the proposed activity.

Do not include activities which have not yet been applied for, unless the activity is well defined and there are solid reasons for believing that it will be taken forward. Consult with [technical advisors](#) as required.

Avoidance measures - Describe any conditions, restrictions or other measures, if any, applicable to the activity/project, and/or to the other activities giving rise to the in combination / cumulative effect, which could remove the risk of deterioration or prevent of achieving water body objectives. Include details of how such measures would be applied, and who would be responsible for applying them.

If required, further details can be provided in separate clearly referenced documents.

Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
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Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
N/A			
Scoping decision of the project cumulatively or 'in combination'		Potential cumulative/in combination impacts conclusion	
Q2.3 Can the risk of deterioration or prevention of achieving water body objectives from in combination and or cumulative effects be ruled out?	(a) If the right-hand column is 'YES' in all cases	It can be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out	
	(b) If any row is 'NO' or 'Don't know' in the right-hand column	It cannot be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out	

Stage 2, Step 4: Overall scoping decision

Scoping assessment	Scoping decisions
Overall scoping decision Q2.4 Is there a potential risk that the proposal may cause deterioration or prevent a water body from meeting its objectives either alone or in combination?	There is no risk of deterioration or prevention of the water body achieving its objectives as a result of the proposal, either alone or in combination, and no further consideration under the Water Framework Directive/Regulations is required in order to determine the application. If this section is selected, delete Q2.5 and Stage 3.

Conclusion of WFD Compliance Assessment & Authorisation

WFD stage 2 scoping has been completed and the activity/project is considered as having no risk of causing deterioration or preventing any water body or WFD Protected Area from reaching its objectives and taking account of the advice from technical officers - is considered compliant with the Water Framework Directive/Regulations.	
Completed by	Jack Thompson
Job title	Marine Licensing Officer
Date	26/07/2024

Consultation with technical advisors/specialists

Relevant section of the WFD compliance assessment	Date(s) of correspondence* and any meeting(s) with technical advisor(s) and include the name of the technical advisor	Description of how the comments from technical advisors have been considered

*Attach a copy of any written correspondence with the WFD assessment for the audit trail

Where there is a dispute on the conclusion the decision should be taken by the Leadership Team member of the team exercising the competent authority role