

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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Stage 2: Scoping Assessment: Complete assessment for each relevant WB

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Stage 3: Detailed Assessment

Conclusion of WFD Compliance Assessment & Authorisation

Consultation with technical advisors/specialists

Figure 1: Stage 1 Screening

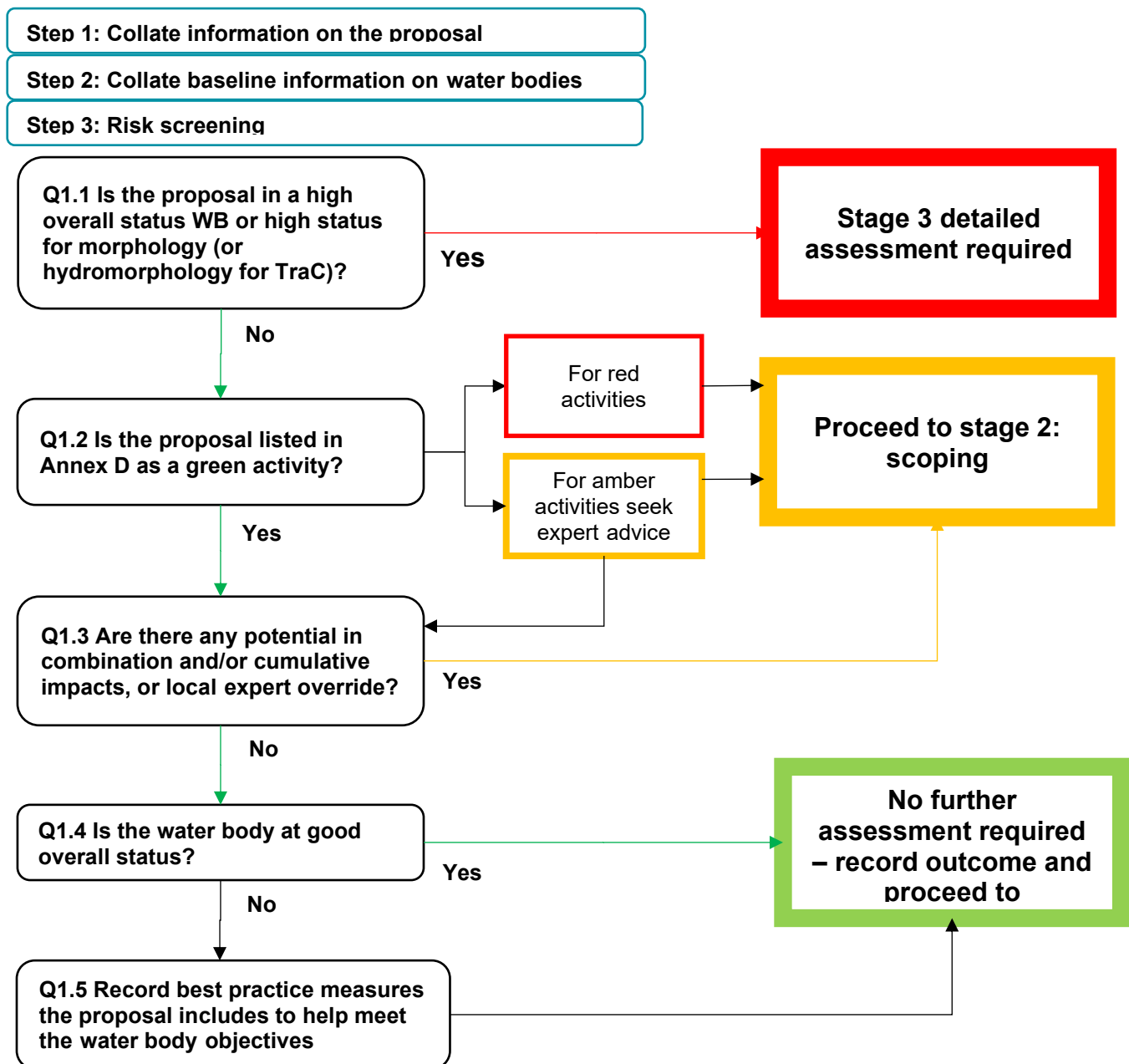
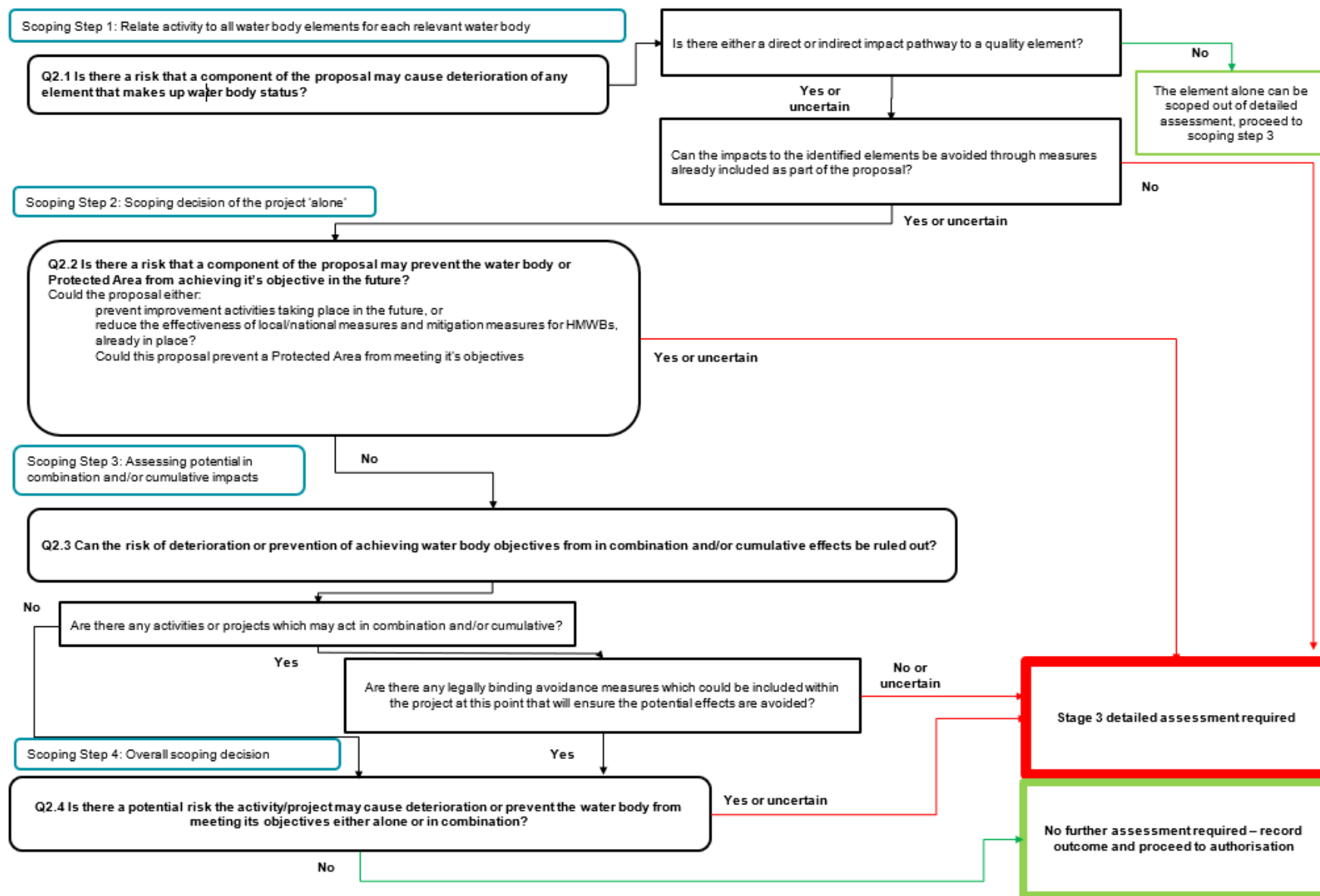


Figure 2: Stage 2 Scoping



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)	RML2516																	
	Date application received	18 February 2025																	
	Applicant details	Mona Offshore Wind Limited																	
	Activity proposed	Up to 12 geotechnical survey investigation boreholes will be taken within the Mona cable route landfall area. Boreholes will be up to 40 m deep and will have a diameter of 102 mm. The total volume of sediment collected will be 3.78 m³. All boreholes will be backfilled with either bentonite pellets or cement/bentonite powder. Prior to backfilling, boreholes will be flushed with a biodegradable and water based flushing medium, whereby flush and any excess drill cuttings not sampled will be returned directly to the water column. It is proposed that the boreholes will be backfilled to 1-2m below the seabed level, with the final 1-2m being allowed to backfill naturally. Boreholes will be cased from the seabed to the jack-up vessel, thus all backfilling (and drilling) and associated equipment will be sealed within this outer casing, mitigating discharges to sea. Backfilling will stabilise the boreholes within the intertidal region to prevent any loss of drill fluids into the surrounding sediments if the boreholes were not to be backfilled.																	
	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 may be required where known	N/A																	
	Location (include map where appropriate)	Mona Landfall Survey Area <table border="1"> <thead> <tr> <th>Lat</th> <th>Long</th> <th>Lat_dd</th> <th>Long_dd</th> </tr> </thead> <tbody> <tr> <td>53° 17.757' N</td> <td>003° 36.794' W</td> <td>53.29594391</td> <td>-3.61323273</td> </tr> <tr> <td>53° 17.721' N</td> <td>003° 36.566' W</td> <td>53.29535069</td> <td>-3.60943691</td> </tr> <tr> <td>53° 17.39' N</td> <td>003° 36.743' W</td> <td>53.28983273</td> <td>-3.61238934</td> </tr> </tbody> </table>			Lat	Long	Lat_dd	Long_dd	53° 17.757' N	003° 36.794' W	53.29594391	-3.61323273	53° 17.721' N	003° 36.566' W	53.29535069	-3.60943691	53° 17.39' N	003° 36.743' W	53.28983273
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53° 17.388' N	003° 36.898' W	53.2898018 4	-3.61496649
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Application documents

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

RML2516 - Application Form
RML2516 - M_Landfall_MLA_overview_20250117
RML2516 eng-marine-inns-biosecurity-ra-and-management-plan v2.1
RML2516 - Mona Geotechnical Nearshore Supporting Information Document v2.0
RML2516 - Mona Landfall HRA v2.0
RML2516 - Mona Landfall WFD Assessment v2.0

Environmental Statement

N/A

List ongoing maintenance requirements.
All structures will require maintenance

N/A

Timing of works

The landfall geotechnical survey is scheduled to start in May 2025 for approximately 16 weeks. However, the marine licence is requested from 12 May 2025 extending until 31 October 2026 to allow contingency in the programme should delays occur such as vessel availability and weather interruption.

Pre-application correspondence

N/A

	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 the North Wales coastal waterbody.
	NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Jack Thompson – Marine Licensing Team
	Date of assessment	18 March 2025

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

Date of classification information: WFD Cycle 3

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
GB641011650000	North Wales	Coastal	Western Wales	Yes	Moderate	Moderate	Moderate	Not assessed	Proposal is: 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:

N/A

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	Yes – complete detailed assessment for each water body
Q1.2	Is the activity listed in Annex D as a green activity? Complete new row for each activity	e.g. Dredging	Yes – go to Q1.3 No – complete scoping assessment for each water body For amber activities then seek expert advice
Q1.3	Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?	Yes/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

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.5	Record best practice measures that the works include to help achieve the objectives of the water body.	For example, a biosecurity plan to ensure the project/activity doesn't introduce or spread Invasive Non-Native Species.	Include all measures then proceed to Authorisation section

**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

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: North Wales Water body ID: GB641011650000			
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 - tidal patterns, for example, dominant currents	Direct	Due to the small scale of the geotechnical survey, negligible changes in morphological conditions and water dynamics are anticipated. Therefore, there is no risk of changes to hydromorphology.	

Scoping table for Transitional and Coastal water bodies

Water body name: North Wales
Water body ID: GB641011650000

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 - wave exposure			
Is the proposal in a HMWB?	Yes		If yes then scope in for detailed assessment
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) - thermal conditions (including shading) - oxygen levels – dissolved oxygen conditions - nutrients - dissolved inorganic nitrogen - microbial patterns	Direct	Borehole removal will result in highly localised short-term increase in suspended sediment concentration/turbidity and release of water based biodegradable drilling fluids. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. Changes in oxygen and nutrient levels as well as microbial patterns and salinity/conductivity may occur. However, these will be temporary, highly localised and would be expected to return to normal within a spring/neap tidal cycle.	
salinity/conductivity			
is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad	Direct	The Mona transmission cable landfall route is situated within the North Wales water body which has a phytoplankton status of moderate. However, no non-temporary effects are predicted as a result of the activities and the geotechnical survey will be carried out with minimal environmental disturbance. As such,	

Scoping table for Transitional and Coastal water bodies

Water body name: North Wales
Water body ID: GB641011650000

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)
		this is not anticipated to result in a significant increase in dissolved inorganic nutrients concentration (sediment disturbance led) which could lead to phytoplankton biomass increases and in turn, impact the phytoplankton status of the water body.	
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).	N/A		
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	Direct	No chemicals on the EQSD will be intentionally released into the marine environment. Bunding, storage facilities and spill kits will be employed to contain and prevent the accidental release of fuel, oils and chemicals associated with equipment and vessels operations into the marine environment.	
activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	Direct	Sediment sampling has been conducted throughout the Mona Offshore Cable Corridor and Access Areas and the Mona Array Area, and no contaminants were observed to exceed Cefas Action Level 1 within the North Wales water body. Therefore, no sediments above Cefas Action Level 1 may be disturbed during the removal of the boreholes.	
or, if the activity releases chemicals on the EQSD list and has a mixing zone, like a discharge pipeline or	N/A		

Scoping table for Transitional and Coastal water bodies

Water body name: North Wales
Water body ID: GB641011650000

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	Direct	No, the impacts are very localised and will not cause changes in the composition and abundance of aquatic flora.	
• changes to the composition and abundance of benthic invertebrate fauna	Direct	No, the impacts are very localised and will not cause changes in the composition and abundance benthic invertebrate fauna.	
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	Higher sensitivity habitats have been identified within the Mona nearshore area including Annex I habitats such as mudflats and sandflats not covered by seawater at low tide, Sabellaria alveolata reef and Mytilus edulis beds. Additionally clay with piddocks have also been identified. However, due to the highly	

Scoping table for Transitional and Coastal water bodies

Water body name: North Wales
Water body ID: GB641011650000

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)
		localised and short-term nature of the geotechnical survey, no impact is expected. The locations of the boreholes have been screened by geophysical survey data. Therefore, geotechnical locations will be sited to avoid sensitive habitats.	
1% or more of any lower sensitivity habitat (see table below)	No		
Fish fauna (Transitional water bodies only): could the proposal lead to:			
- changes to the composition, abundance and age structure of fish fauna - 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) - entrainment or impingement of fish - refuge/predation areas	Direct	Borehole removal will result in highly localised short-term increase in suspended sediment concentration/turbidity, release of water based biodegradable drilling fluids and underwater noise. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. Changes in oxygen and nutrient levels as well as microbial patterns and salinity/conductivity may occur. However, these will be temporary, highly localised and would be expected to return to normal within a spring/neap tidal cycle.	
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	The works are not located near an estuary. The nearest estuary is >6 km away.	

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	
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.

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	Works are located within Liverpool Bay SPA. HRA has been completed and NRW A consulted.
• Bathing Waters	No	
• Shellfish Waters	No	
Other Protected and Priority habitats and species.		
• Nationally or locally protected areas e.g. SSSI, NNR etc	No	
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	No	
• Section 7 list of priority species e.g. water voles	No	

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?	No
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?	No

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	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.
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? (choose one of the following options and delete the other)	If this section is selected, delete Q2.5 and Stage 3. There is a risk the proposal may cause deterioration or prevent the water body from meeting its objectives and therefore a detailed compliance assessment might be required if no mitigation measures that can be included at Q2.5. If this section is selected, complete Q2.5.

Stage 3: Detailed Assessment

The amount of information provided at this stage will vary depending on the scale and nature of the project and its potential environmental effects. The detail presented at this stage should be proportionate to the scale of the project and its potential risks. For complex cases then a separate report for detailed assessment would be appropriate. For example, if the only aspect of a project being scoped in to stage 3 is the risk of chemical spills during a construction activity and the mitigation being proposed is a Construction Environmental Management Plan to ensure adequate management of the risks are in place then this may be best presented as a simple table. On the other end of the scale, for a complex project we would expect to see the evidence presented of the underpinning assessments for all aspects of the project that had been scoped in to Stage 3. This information is likely to be drawn from modelling studies and other assessments carried out as part of the wider EIA process where relevant and this should cover the following as a minimum:

Assessing for Deterioration

Deterioration in this context refers to deterioration from one status class to a lower one, unless the element is already at bad status and then this also includes within class deterioration.

Temporary effects to not count as deterioration if the water body/ies in question would recover within a short period of time.

Consider if the effects arising from the project are:

- Direct or indirect/secondary

- Alone or in combination; cumulative
- Ensure all stages of the project have been covered in the assessment where relevant, including construction, operation and maintenance, decommissioning

If stage 3 identifies a risk of deterioration, then avoidance of the impact must be considered. If this is not practicable, mitigation should be then considered to reduce the effects as far as is possible. In this context, mitigation can only apply to the water body/ies which are at risk of deterioration, it does not include compensation in other water bodies.

Protected Areas

This stage should also consider the impact of the activity on each of the protected areas identified at the scoping stage.

If it is identified that there is a potential to impact to a SAC/SPA/RAMSAR site, then an HRA must also be carried out; this should be clearly referenced within this section if so.

Assessment of Invasive and Non-native Species (INNS)

If there is a risk of the project introducing or spreading INNS, then a Biosecurity Risk Assessment must also be carried out in association with the project and clearly referenced within this section.

Jeopardising Good Status

If the water body being assessed is at less than good status, it will have the objective of achieving good status by a set date. If this is the case, it must be assessed whether the project will jeopardise the attainment of good status. This is done by assessing if the project may impact upon any improvement measures being currently carried out in the water body by conflicting with them or reducing their effectiveness. A list of water body improvement measures can be found in the RBMPs.

HMWBs – Jeopardising Mitigation Measures

If the water body in question is designated as a HMWB, then there will be a set of water body mitigation measures associated with it. This stage of the assessment must also consider if the project is in conflict with the water body mitigation measures either now or in future. The list of water body mitigation measures can be found on [Water Watch Wales](#).

Stage 3 decision table.

Water body name & ID	WFD element/s scoped in	Description of impacts; include a list of all evidence documents to inform the detailed assessment	Mitigation measures	Is there risk of the activity preventing the water body/ PA from meeting its objectives?* 'YES' or 'NO'	Can the risk of deterioration be ruled out?* 'YES' or 'NO'
North Wales GB641011650000	N/A	As the works are taking place within a HMWB, a detailed assessment is required. However, all WFD elements have been scoped out at Stage 2.	N/A	NO	YES

* Where there is uncertainty if the proposed activity may prevent a water body or PA from meeting its objectives or may cause deterioration then we must follow a precautionary approach, contact the Integrated Water Planning team for further advice.

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.	
In light of the conclusions of a detailed compliance assessment (Stage 3), and taking account of the advice received from technical specialist advisors, it has been established that the activity/project has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives, taking into account any conditions or restrictions as applicable, either alone or in-combination with other activities.	
Completed by	Jack Thompson
Job title	Marine Licensing Team

Date	18 March 2025

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
No comments received.	02 May 2025	

*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