



WFD Compliance Assessment

1. 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

Contents

Stage 1

- **Stage 1, step 1: proposal details (for external applications to NRW use 1a; for internal NRW projects use 1b)**
- **Stage 1, step 2: Collate baseline information on water bodies.**
- **Stage 1, Step 3: Risk Screening**

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

- **Stage 2, step 1: relate activity to all water body elements for each relevant water body.**
- **Stage 2, step 2: Scoping decision of the project ‘alone’**
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- **Stage 2, Step 4: Overall scoping decision**

Conclusion of WFD Compliance Assessment & Authorisation

Consultation with technical advisors/specialists

Figure 1: Stage 1 Screening

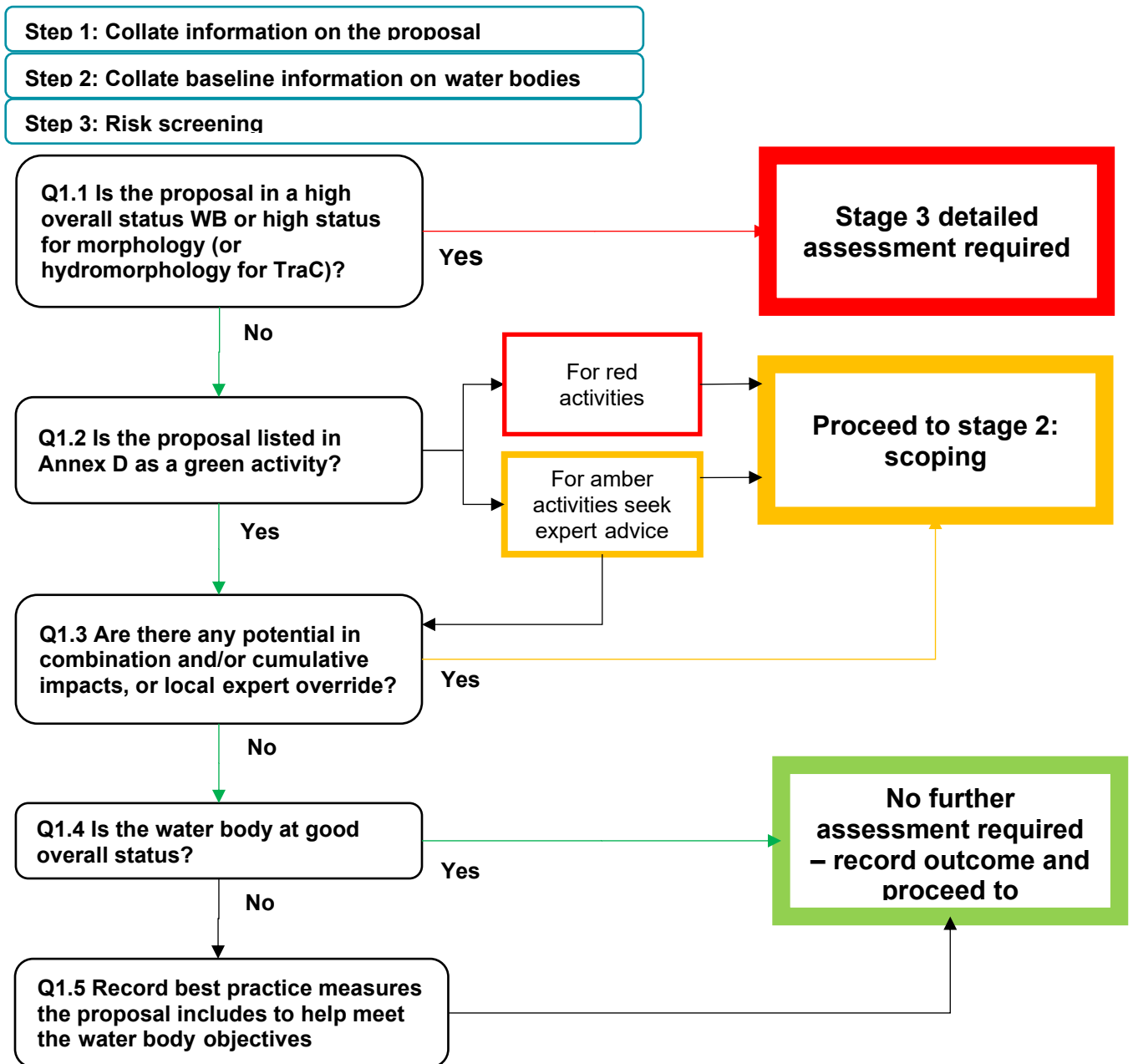
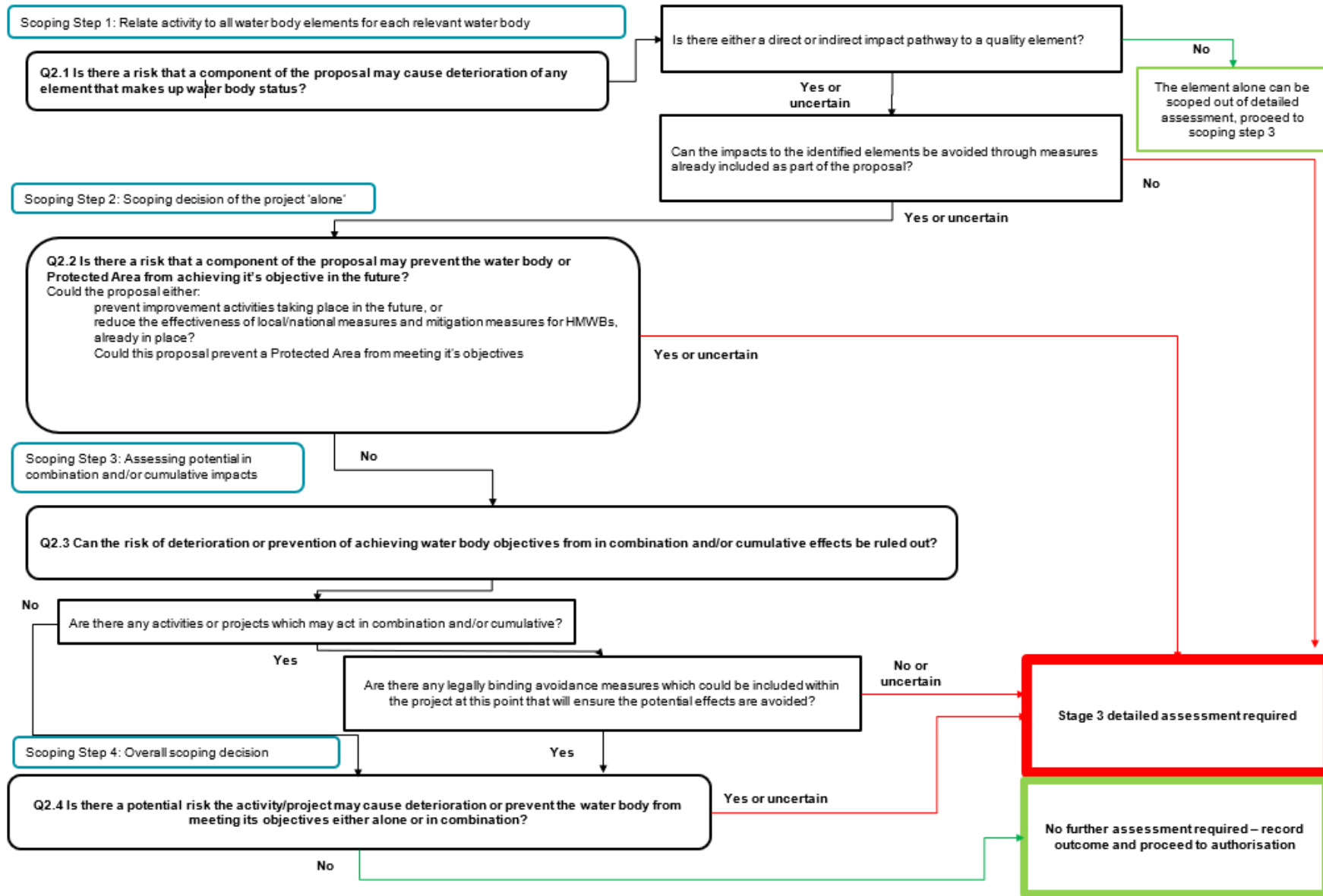


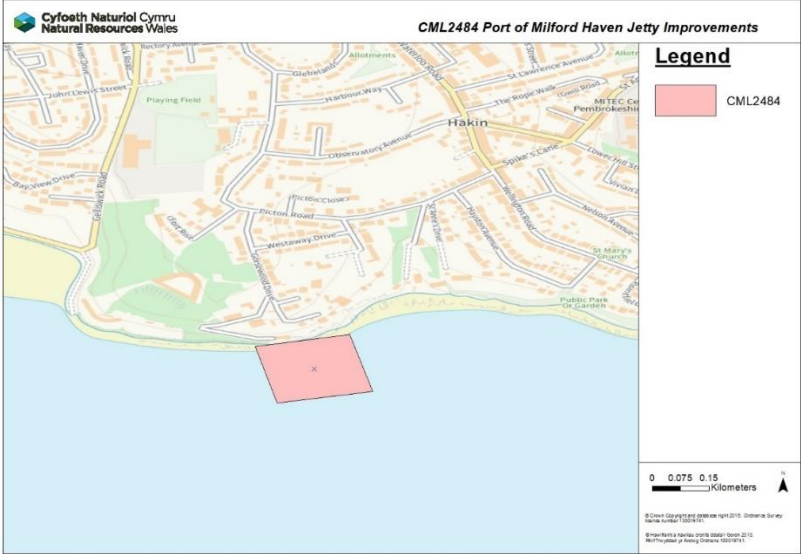
Figure 2: Stage 2 Scoping



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)	CML2484									
	Date application duly made	18 December 2024									
	Applicant details	Milford Haven Port Authority									
	Activity proposed	<p>Milford Haven Port Authority Jetty Improvements</p> <ul style="list-style-type: none"> • Removal of the existing welfare cabin, gangway (once new gangway is in place), pontoons and two restraining piles. • Installation of a new gangway and full-length pontoon (West to East leg of jetty) adjacent to the jetty head extending its full length. The gangway and pontoon will be attached to the existing West-East Jetty leg via vertical fender piles that are affixed to the jetty itself and do not require installation into the seabed. • Installation of a new finger pontoon, extending perpendicular from the North-South jetty • leg at its northern extent, supported by up to 6 piles up to 600mm • Installation of one new and one replacement welfare cabins on the jetty deck. One on the short leg and the other on the long leg. • Installation of a replacement diesel fuel hose as part of the existing fuel dispensing station on the jetty head as well as one additional fuel dispenser and an onshore diesel storage tank. • Reinstallation of water and electrical systems from existing landside services 									
	Relevant legislation	<p>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</p> <p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</p>									
	List other permissions that may be required where known	N/A									
	Location (include map where appropriate)	<p>Milford Haven Port Authority Jetty</p> <table border="0"> <thead> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>51.707200</td> <td>-5.052491</td> </tr> <tr> <td>51.707479</td> <td>-5.050263</td> </tr> <tr> <td>51.706143</td> <td>-5.049699</td> </tr> <tr> <td>51.705876</td> <td>-5.051969</td> </tr> </tbody> </table>	Latitude	Longitude	51.707200	-5.052491	51.707479	-5.050263	51.706143	-5.049699	51.705876
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51.705876	-5.051969										

		
	<p>Application documents <i>Include: Project purpose and background, site map, scaled plan, site photographs and working method statement.</i></p>	<p>CML2484 MLA Form_CLEAN CML2484 PC1477 MHPA 2020 Pilot Boat Jetty Environmental Report_CLEAN CML2484 - PC1477 MHPA 2020 Pilot Boat Jetty HRA CML2484 - PC1477 MHPA 2020 Pilot Boat Jetty WER CML2484 PBJ_area_coordinates CML2484 Applicant Response Document 2</p>
	<p>Environmental Statement</p>	<p>N/A</p>
	<p>List ongoing maintenance requirements. All structures will require maintenance</p>	<p>N/A</p>
	<p>Timing of works</p>	<p>The proposed works are expected to be undertaken for maximum of 3 months. Timing is dependent on the marine licence issue date and could also be delayed due to weather/availability of materials, hence an expiry date in 2026 is requested.</p>
	<p>Pre-application correspondence</p>	<p>N/A</p>
	<p>Are the works located within a WFD waterbody? Or do they have the potential to impact upon a WFD water body?</p>	<p>The works are located within the Milford Haven Outer waterbody and are adjacent to the Milford Haven Inner and Huberston Pill - headwaters to tidal limit waterbodies.</p>

	Waterbodies include surface waters (rivers, lakes, transitional waters, and coastal waters out to 1 nautical mile) and groundwaters	
	NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Jack Thompson – Marine Licensing Team
	Date of assessment	21 January 2025

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

Date of classification information: WFD Cycle 3 (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
GB641008220000	Milford Haven Outer	Coastal	Western Wales	No	Moderate	Moderate	Moderate	Not high	Proposal is: <ul style="list-style-type: none"> in the water body
GB110061031240	Huberston Pill - headwaters to tidal limit	River	Western Wales	No	Moderate	Moderate	High	High	Proposal is: Adjacent to the water body
GB531006114100	Milford Haven Inner	Transitional	Western Wales	No	Moderate	Moderate	Moderate	Not high	Proposal is: Adjacent to 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:

Pembrokeshire South - GB611008590003: Although hydrologically connected, it is 8.5km from the works site. Given the small scale nature of the works, no impact is expected.

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	Milford Haven Outer No – go to Q1.2

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
			<p>Huberston Pill - headwaters to tidal limit</p> <p>Yes – complete detailed assessment for each water body</p> <p>Milford Haven Inner</p> <p>No – go to Q1.2</p>
Q1.2	<p>Is the activity listed in Annex D as a green activity? Complete new row for each activity</p>	<p>Installation of a new gangway, pontoons and terrestrial structures (welfare cabin, diesel fuel hose etc.</p> <p>This will involve the installation of 32 piles each with a diameter of up to 600mm.</p>	<p>No – complete scoping assessment for each water body</p>
Q1.3	<p>Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?</p>	<p>Yes/No</p>	<p>Yes – complete scoping assessment for each water body</p> <p>No – go to Q1.4</p>
Q1.4	<p>Is the water body at Good overall status?–</p>	<p>Yes/No</p>	<p>Yes, no further WFD assessment needed – Go to Authorisation</p> <p>No – Go to Q1.5</p>

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.		<p data-bbox="1234 233 1890 264">Include all measures then proceed to Authorisation section</p> <p data-bbox="1234 268 1890 336"><i>For example, a biosecurity plan to ensure the project/activity doesn't introduce or spread Invasive Non-Native Species.</i></p>

**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 River			
Water body name: <i>Huberston Pill - headwaters to tidal limit</i> Water body ID: GB110061031240			
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)
Rivers and Lake 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:			
<ul style="list-style-type: none"> changes to flows, for example, changes to wetted width or depth profile abstraction of water (changes to quality and dynamics of water flow) 	N/A – no impact pathway	The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located downstream. As such, there is no impact pathway.	

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
<ul style="list-style-type: none"> changes the physical form including structure and substrate of the river/lake bed or connection to groundwater or alter the process of sediment transport (erosion, deposition or transfer) 			
Is the proposal in a HMWB?	No		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:

<ul style="list-style-type: none"> water clarity (turbidity or suspended particulate matter concentration) 	Indirect	As the works involve the installation of 6 piles, and the removal of some existing piles, sediment will be disturbed and this has the potential to reduce water clarity. However, it is unlikely that significant volumes will be disturbed and potential suspended sediments would be limited to the seabed directly adjacent to each pile. Due to the temporary and small-scale increase in turbidity, detrimental impacts are unlikely.	
<ul style="list-style-type: none"> temperature oxygen levels nutrients: total phosphorus concentration (Lakes); soluble reactive phosphorus concentration (Rivers). 	N/A – no impact pathway	The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located downstream. As such, there is no impact pathway.	

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
<ul style="list-style-type: none"> • microbial patterns • salinity/conductivity • acidification status 			
<p>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:</p>			
<ul style="list-style-type: none"> • chemicals are on the Environmental Quality Standards Directive (EQSD) list 	Indirect	<p>The works will be undertaken in accordance with standard operating and best practice procedures to prevent/minimise the release of any chemicals that are on the Environmental Quality Standards Directive (EQSD) List.</p> <p>Piling activities have the potential to resuspend sediments and therefore any chemicals within the sediment. However, due to the small scale of the proposed piling activities, any plume of suspended sediment will be small and release of any chemicals into the water column would be negligible.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The following condition will be included on the licence:</p>
<ul style="list-style-type: none"> • 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. 			

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
			<p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>

Biology
 Expert judgement will be required to consider whether any changes to the hydromorphology or water quality brought about by the project will potentially impact upon the Biological Quality Elements (BQEs) and may cause deterioration in status.
 Identify if the activity or project could impact on the abundance or composition of the biological elements listed below:

- Benthic invertebrates
- Fish
- Phytoplankton
- Macrophytes and phytobenthos

Could the proposal lead to:

<ul style="list-style-type: none"> • changes to the composition and abundance of aquatic flora 	Indirect	As the works involve the installation of 6 piles, and the removal of some existing piles,	
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Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
		sediment will be disturbed and this has the potential to smother flora once settled. However, it is unlikely that significant volumes will be disturbed and therefore any impacts would be negligible.	
<ul style="list-style-type: none"> changes to the composition and abundance of benthic invertebrate fauna 	Direct	Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact benthic fauna.	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this</i></p>

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
			<p><i>isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p>

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
 Water body ID: GB110061031240

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)
			<p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i></p>
Fish fauna: could the proposal lead to:			
<ul style="list-style-type: none"> • 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	<p>Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact migratory fish.</p> <p>Changes in underwater noise can result in lethal effects, physical injury or behavioural effects on fish.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p>

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
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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)
			<p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any</i></p>

Scoping table for River

Water body name: *Huberston Pill - headwaters to tidal limit*
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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)
			<p><i>proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer

Water body ID: GB641008220000

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. <i>Could the proposal lead to changes in:</i>			
<ul style="list-style-type: none"> • morphological conditions, for example depth variation, the seabed and intertidal zone structure 	Direct	There will be no change to hydromorphology of the water body. While the proposed works are expected to involve changes in pile number, type and location, significant changes to coastal processes and hydrodynamics once the jetty is operational are not anticipated particularly due to the sheltered nature of the Waterway.	
<ul style="list-style-type: none"> • tidal patterns, for example, dominant currents 			
<ul style="list-style-type: none"> • freshwater flow 			
<ul style="list-style-type: none"> • wave exposure 			
Is the proposal in a HMWB?	No		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:			
<ul style="list-style-type: none"> • water clarity (turbidity or suspended particulate matter concentration) 	Indirect	As the works involve the installation of 6 piles, and the removal of some existing piles, sediment will be disturbed and this has the	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
Water body ID: GB641008220000

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)
		potential to reduce water clarity. However, it is unlikely that significant volumes will be disturbed and therefore any impacts would be negligible.	
<ul style="list-style-type: none"> thermal conditions (including shading) 	Direct	The installation of the larger pontoon will lead to additional shading however, it is not a significant increase, particularly when viewed in relation to the overall size of the waterbody. As such, any impact would be negligible.	
<ul style="list-style-type: none"> oxygen levels – dissolved oxygen conditions 	Direct	<p>The improvements to the Port Authority Jetty would not disturb significant volumes of sediment therefore effects on water quality associated with physio-chemical parameters are not predicted. Any sediment disturbed by the proposed works would be temporary in nature and minimal in comparison to ongoing operations undertaken throughout Milford Haven Waterway. Therefore, no significant impact to water quality is expected as a result of the proposed works.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The</p>
<ul style="list-style-type: none"> nutrients - dissolved inorganic nitrogen 			
<ul style="list-style-type: none"> microbial patterns 			
<ul style="list-style-type: none"> salinity/conductivity 			

Scoping table for Transitional and Coastal water bodies

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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)
			<p>following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>
<ul style="list-style-type: none"> is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad 	N/A - Other	Waterbody has a 'high' status for phytoplankton.	
<ul style="list-style-type: none"> 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 - Other	No records to show that harmful algae has been found.	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
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:			
<ul style="list-style-type: none"> chemicals are on the Environmental Quality Standards Directive (EQSD) list activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). 	Direct	<p>The works will be undertaken in accordance with standard operating and best practice procedures to prevent/minimise the release of any chemicals that are on the Environmental Quality Standards Directive (EQSD) List.</p> <p>Piling activities have the potential to resuspend sediments and therefore any chemicals within the sediment. However, due to the small scale of the proposed piling activities, any plume of suspended sediment will be small and release of any chemicals into the water column would be negligible.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities.</i></p>
<ul style="list-style-type: none"> 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. 			

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
			<p><i>No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>

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:

<ul style="list-style-type: none"> • changes to the composition and abundance of aquatic flora 	Direct	<p>As a result of the piling, a small area of habitat loss is expected. The expected loss has been calculated as up to 1.68m². Use of spud legs on the jack up barge may also result in habitat loss.</p> <p>The 1.68m² of loss represents a small proportion of the overall SAC area (approximately 0.00000012%), and a small</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable</p>
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Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
		<p>proportion of the feature itself. As such, the scale of the loss in comparison to the size of the feature is negligible. Additionally, the removal of the existing pontoon piles could expose previously lost habitat areas (up to 0.32m²).</p> <p>Although use of spud legs may also result in habitat loss, they are temporarily deployed and are not a permanent fixture. The holes created will take a significant amount of time to infill (i.e. more than 6 years), and therefore, recovery of the seagrass habitat will not be immediate. However, given the relatively small area of potential loss which could occur, it is unlikely this would result in an adverse effect on site integrity.</p> <p>Given the nature of the area, with regular vessel movement and occasional maintenance dredging operations, the likelihood of Annex I reef habitat within this area is minimal and no loss of this habitat is expected.</p> <p>During construction, piling activities have the potential to resuspend sediments resulting in short term, localised increases in turbidity, which may temporarily lead to increased sediment deposition within the vicinity of the proposed works. Any plume of suspended sediment is expected to be small and quickly dispersed by tidal and surface currents.</p>	<p>location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
		There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.	<i>Authority prior to any changes being enacted.</i>
<ul style="list-style-type: none"> • changes to the composition and abundance of benthic invertebrate fauna 	Direct	Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact benthic fauna.	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
			<p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
			<i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i>
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)	Yes	<p>The area is located within 500m of a higher sensitivity habitat – subtidal kelp beds. However, the construction works are more than 100m from this habitat and indirect effects from increased sedimentation will be minimal given the small volumes disturbed.</p> <p>It has not been determined through surveys however, there is the potential for the works to be located on an area of seagrass. As a result of the piling, a small area of habitat loss is expected. The expected loss has been calculated as up to 1.68m². Use of spud legs on the jack up barge may also result in habitat loss.</p> <p>The 1.68m² of loss represents a small proportion of the overall SAC area (approximately 0.00000012%), and a small proportion of the feature itself. As such, the</p>	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
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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)
		<p>scale of the loss in comparison to the size of the feature is negligible. Additionally, the removal of the existing pontoon piles could expose previously lost habitat areas (up to 0.32m²).</p> <p>Although use of spud legs may also result in habitat loss, they are temporarily deployed and are not a permanent fixture. The holes created will take a significant amount of time to infill (i.e. more than 6 years), and therefore, recovery of the seagrass habitat will not be immediate. However, given the relatively small area of potential loss which could occur, it is unlikely this would result in an adverse effect on site integrity.</p>	
<ul style="list-style-type: none"> 1% or more of any lower sensitivity habitat (see table below) 	No		
<p>Fish fauna (Transitional water bodies only): could the proposal lead to:</p>			
<ul style="list-style-type: none"> changes to the composition, abundance and age structure of fish fauna 			
<ul style="list-style-type: none"> 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) 	Direct	<p>Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact migratory fish.</p> <p>Changes in underwater noise can result in lethal effects, physical injury or behavioural effects on fish.</p>	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC)</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
			<p>guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer

Water body ID: GB641008220000

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)
			<p><i>in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i></p>
<ul style="list-style-type: none"> • entrainment or impingement of fish 	Direct	<p>While the proposed works are expected to involve changes in pile number, type and location as well as installation of new pontoon structures, the changes are not significant and are not expected to cause entrainment or impingement of fish.</p> <p>Furthermore, works will be undertaken from land or from a jack up/floating barge and, given their nature, do not pose an entrainment or impingement risk.</p>	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer

Water body ID: GB641008220000

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)
<ul style="list-style-type: none"> refuge/predation areas 	Direct	While the proposed works are expected to involve changes in pile number, type and location as well as installation of new pontoon structures, the changes are not significant and are not expected to have a detrimental impact on refuge/predation areas.	
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	Direct	<p>Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact migratory fish.</p> <p>Changes in underwater noise can result in lethal effects, physical injury or behavioural effects on fish.</p>	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this</i></p>

Scoping table for Transitional and Coastal water bodies

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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)
			<p><i>isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer
 Water body ID: GB641008220000

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)
			<p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
 Water body ID: GB531006114100

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)
<p>Transitional and Coastal water bodies</p>	<p>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</p>	<p>Further detail on potential impacts. Where N/A is included then provide detail to explain.</p>	<p>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</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner

Water body ID: GB531006114100

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)
<p>Hydromorphology – hydromorphology constitutes both ‘hydrology’ and ‘geomorphology’ and describes the physical characteristics and processes of a water body.</p> <p><i>Could the proposal lead to changes in:</i></p>			

<ul style="list-style-type: none"> morphological conditions, for example depth variation, the seabed and intertidal zone structure 	<p>N/A – no impact pathway</p>	<p>The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located 3.5km downstream. As such, there is no impact pathway.</p>	
<ul style="list-style-type: none"> tidal patterns, for example, dominant currents 			
<ul style="list-style-type: none"> freshwater flow 			
<ul style="list-style-type: none"> wave exposure 			
<p>Is the proposal in a HMWB?</p>	<p>No</p>		<p>If yes then scope in for detailed assessment</p>

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:

<ul style="list-style-type: none"> water clarity (turbidity or suspended particulate matter concentration) 	<p>Indirect</p>	<p>As the works involve the installation of 6 piles, and the removal of some existing piles, sediment will be disturbed and this has the potential to reduce water clarity. However, it is unlikely that significant volumes will be disturbed and therefore any impacts would be negligible.</p>	
<ul style="list-style-type: none"> thermal conditions (including shading) 	<p>Indirect</p>	<p>The works are not taking place within the waterbody, they are within the Milford Haven</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
 Water body ID: GB531006114100

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)
<ul style="list-style-type: none"> • oxygen levels – dissolved oxygen conditions • nutrients - dissolved inorganic nitrogen • microbial patterns • salinity/conductivity • is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad 		<p>Outer waterbody which is located 3.5km downstream however, there is the potential for accidental pollution during construction as well as operation of the new fuel storage facility and this may be transported downstream.</p>	<p>monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p>
<ul style="list-style-type: none"> • 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). 			<p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
Water body ID: GB531006114100

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)
			<p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>
<p>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:</p>			
<ul style="list-style-type: none"> chemicals are on the Environmental Quality Standards Directive (EQSD) list activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). 	<p>Indirect</p>	<p>The works will be undertaken in accordance with standard operating and best practice procedures to prevent/minimise the release of any chemicals that are on the Environmental Quality Standards Directive (EQSD) List.</p> <p>Piling activities have the potential to resuspend sediments and therefore any chemicals within the sediment. However, due to the small scale of the proposed piling activities, any plume of suspended sediment will be small and release of any chemicals into the water column would be negligible.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit</p>
<ul style="list-style-type: none"> 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. 			

Scoping table for Transitional and Coastal water bodies

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Water body ID: GB531006114100

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			<p>a CEMP which must be signed off by NRW prior to commencing works. The following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner

Water body ID: GB531006114100

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)
<p>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:</p> <ul style="list-style-type: none"> • Benthic invertebrates (T, C) • Fish (T) • Phytoplankton (T, C) • Macroalgae (T, C) • Angiosperms (T, C) <p>Could the proposal lead to:</p>			
<ul style="list-style-type: none"> • changes to the composition and abundance of aquatic flora 	Indirect	<p>As the works involve the installation of 6 piles, and the removal of some existing piles, sediment will be disturbed and this has the potential to smother flora once settled. However, it is unlikely that significant volumes will be disturbed and therefore any impacts would be negligible.</p> <p>There is the potential for accidental pollution during construction as well as operation of the new fuel storage facility.</p>	<p>The applicant has explained that an Oil Spill Contingency Plan is in place which is monitored and approved by the Maritime and Coastguard Agency and a quick deployment containment boom is currently located on the jetty platform to prevent oil from spreading in the event of a large-scale accidental oil spill. This equipment will remain in a suitable location during construction and on the jetty or pontoons once installed.</p> <p>The applicant has stated that they will follow all best practice measures such as the use of bunded storage facilities and provision of spill kits to ensure that the risk of a pollution event is minimised.</p> <p>To ensure that these measures are secured, the applicant will need to submit a CEMP which must be signed off by NRW prior to commencing works. The</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner

Water body ID: GB531006114100

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)
			<p>following condition will be included on the licence:</p> <p><i>The Licence Holder must submit a construction environment management plan to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i></p>
<ul style="list-style-type: none"> • changes to the composition and abundance of benthic invertebrate fauna 	Direct	Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact benthic fauna.	The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then

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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)
			<p>the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p>

Scoping table for Transitional and Coastal water bodies

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Water body ID: GB531006114100

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)
			<p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i></p>
<p>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:</p>			
<ul style="list-style-type: none"> • 0.5km² or larger • 1% or more of the water body's area • Within 500m of any higher sensitivity habitat (see table below) 	<p>N/A – no impact pathway</p>	<p>The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located 3.5km</p>	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
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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)
<ul style="list-style-type: none"> 1% or more of any lower sensitivity habitat (see table below) 		downstream. As such, there is no impact pathway.	
Fish fauna (Transitional water bodies only): could the proposal lead to:			
<ul style="list-style-type: none"> 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) 	Direct	<p>Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact migratory fish.</p> <p>Changes in underwater noise can result in lethal effects, physical injury or behavioural effects on fish.</p>	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
 Water body ID: GB531006114100

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)
			<p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner

Water body ID: GB531006114100

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)
			<i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior written approval from the Licensing Authority.</i>
<ul style="list-style-type: none"> • entrainment or impingement of fish 	Direct	<p>The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located 3.5km downstream however, given that the waterbodies are hydrologically linked, the works could present a barrier to migration so must be considered.</p> <p>While the proposed works are expected to involve changes in pile number, type and location as well as installation of new pontoon structures, the changes are not significant and are not expected to cause entrainment or impingement of fish.</p> <p>Furthermore, works will be undertaken from land or from a jack up/floating barge and, given their nature, do not pose an entrainment or impingement risk.</p>	
<ul style="list-style-type: none"> • refuge/predation areas 	Direct	<p>While the proposed works are expected to involve changes in pile number, type and location as well as installation of new pontoon structures, the changes are not significant and are not expected to have a detrimental impact on refuge/predation areas.</p>	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
 Water body ID: GB531006114100

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)
<p>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</p>	<p>Direct</p>	<p>The works are not taking place within the waterbody, they are within the Milford Haven Outer waterbody which is located 3.5km downstream however, given that the waterbodies are hydrologically linked, the works could present a barrier to migration so must be considered.</p> <p>Changes in underwater noise resulting from the piling activities included in the proposed works have the potential to impact migratory fish.</p> <p>Changes in underwater noise can result in lethal effects, physical injury or behavioural effects on fish.</p>	<p>The percussive piling will be relatively short-term however, to minimise the potential for impacts, all percussive piling will be undertaken using a soft-start procedure to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure will be repeated. This will be undertaken in-line with Joint Nature Conservation Committee (JNCC) guidance, to minimise the potential for impacts to migratory fish and mammals that may be present in the vicinity of the works.</p> <p>To secure appropriate mitigation, the following piling conditions will be added to the licence:</p> <p><i>The Licence Holder must ensure that vibro-piling is used when inserting piles where operationally possible. Where this isn't possible, percussive piling may be used.</i></p> <p><i>The Licence Holder must ensure that if percussive piling is used, soft-start procedures are used to ensure</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
 Water body ID: GB531006114100

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)
			<p><i>incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration should be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.</i></p> <p><i>The Licence Holder must ensure there is a 12 consecutive hour break in piling activities in any 24-hour period.</i></p> <p><i>The Licence Holder must ensure all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented. Any proposed changes to the actions outlined in this document must be submitted to and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p> <p><i>To prevent impacts on migratory fish, particularly lamprey, the following timing restriction will be conditioned:</i></p> <p><i>The Licence Holder must ensure that no percussive piling takes place between October to May inclusive, without prior</i></p>

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Inner
Water body ID: GB531006114100

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)
			<i>written approval from the Licensing Authority.</i>

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
Milford Haven Outer - GB641008220000 Huberston Pill - headwaters to tidal limit - GB110061031240 Milford Haven Inner - GB531006114100	Direct	Potential for INNS to be introduced via vessels/materials being used as part of the works.	Vessels required to undertake the proposed works are expected to be sourced from the European fleet and should present no greater risk than typical shipping. Vessels will follow International Maritime Organisation rules to prevent introduction of non-native species.

			<p>A biosecurity risk assessment will be completed prior to the commencement of activities. The following condition will be added to the licence:</p> <p><i>The Licence Holder must submit a biosecurity risk assessment to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i></p> <p><i>The Licence Holder must ensure that any actions outlined in the documents detailed are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.</i></p>
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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:		
<ul style="list-style-type: none"> SACs/SPAs/RAMSAR 	Yes	HRA undertaken to assess impacts on Pembrokeshire Marine SAC, West Wales Marine SAC, Cardigan Bay SAC and Pen Llyn a'r Sarnau SAC. NRW Advisory have been consulted.
<ul style="list-style-type: none"> Bathing Waters 	No	
<ul style="list-style-type: none"> Shellfish Waters 	No	
Other Protected and Priority habitats and species.		
<ul style="list-style-type: none"> Nationally or locally protected areas e.g. SSSI, NNR etc 	Yes	Milford Haven Waterway – NRW A consulted on potential impacts.
<p>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.</p>		

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?

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.

<ul style="list-style-type: none"> Section 7 list of priority habitats e.g. wetlands 	<p>Yes</p>	<p>Listed features of the Pembrokeshire Marine SAC and therefore considered as part of the HRA. NRW Advisory have also been consulted.</p>
<ul style="list-style-type: none"> Section 7 list of priority species e.g. water voles 		

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

Scoping assessment	Scoping decisions
<p>Q2.1 Is there a risk that a component of the proposal may cause deterioration of any element that makes up water body status?</p>	<p>No</p>
<p>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?</p>	<p>No</p>

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'
DML2166 - Disposal of dredge material	The dredge activity under DML2166 will disturb large amounts of sediment. In comparison, the amount of sediment disturbed through the piling activities as part of CML2484 is insignificant. Therefore, when viewed in combination, there would be no adverse effect as the additional volumes produced are negligible.	N/A	Yes
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	(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	

<p>Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i></p>	<p>Nature of the in-combination/cumulative effect (if any)</p>	<p>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?</p>	<p>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'</p>
<p>objectives from in combination and or cumulative effects be ruled out?</p>			

Stage 2, Step 4: Overall scoping decision

<p>Scoping assessment</p>	<p>Scoping decisions</p>
<p>Overall scoping decision</p> <p>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? <i>(choose one of the following options and delete the other)</i></p>	<p>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.</p> <p>If this section is selected, delete Q2.5 and Stage 3.</p>

Conclusion of WFD Compliance Assessment & Authorisation

<p>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.</p>	
<p>Completed by</p>	<p>Jack Thompson</p>
<p>Job title</p>	<p>Marine Licensing Officer</p>

Date	21 January 2025
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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
Stage 2: Scoping	27 February 2025 04 March 2025 02 May 2025	Additional information requested from applicant. Following the provision of additional information, the WFD assessment was updated accordingly.

*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