



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]			

Figure 1: Stage 1 Screening

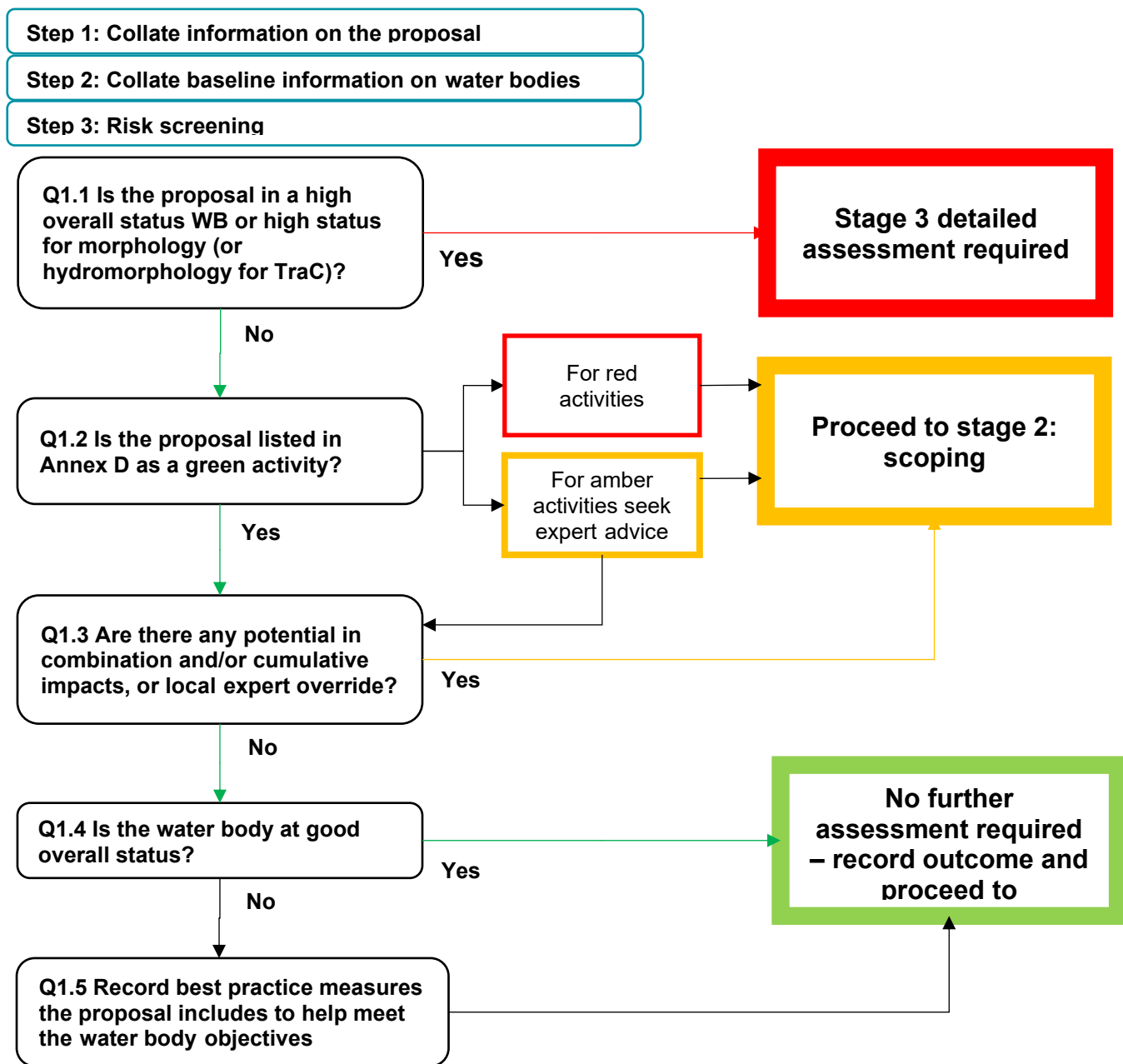
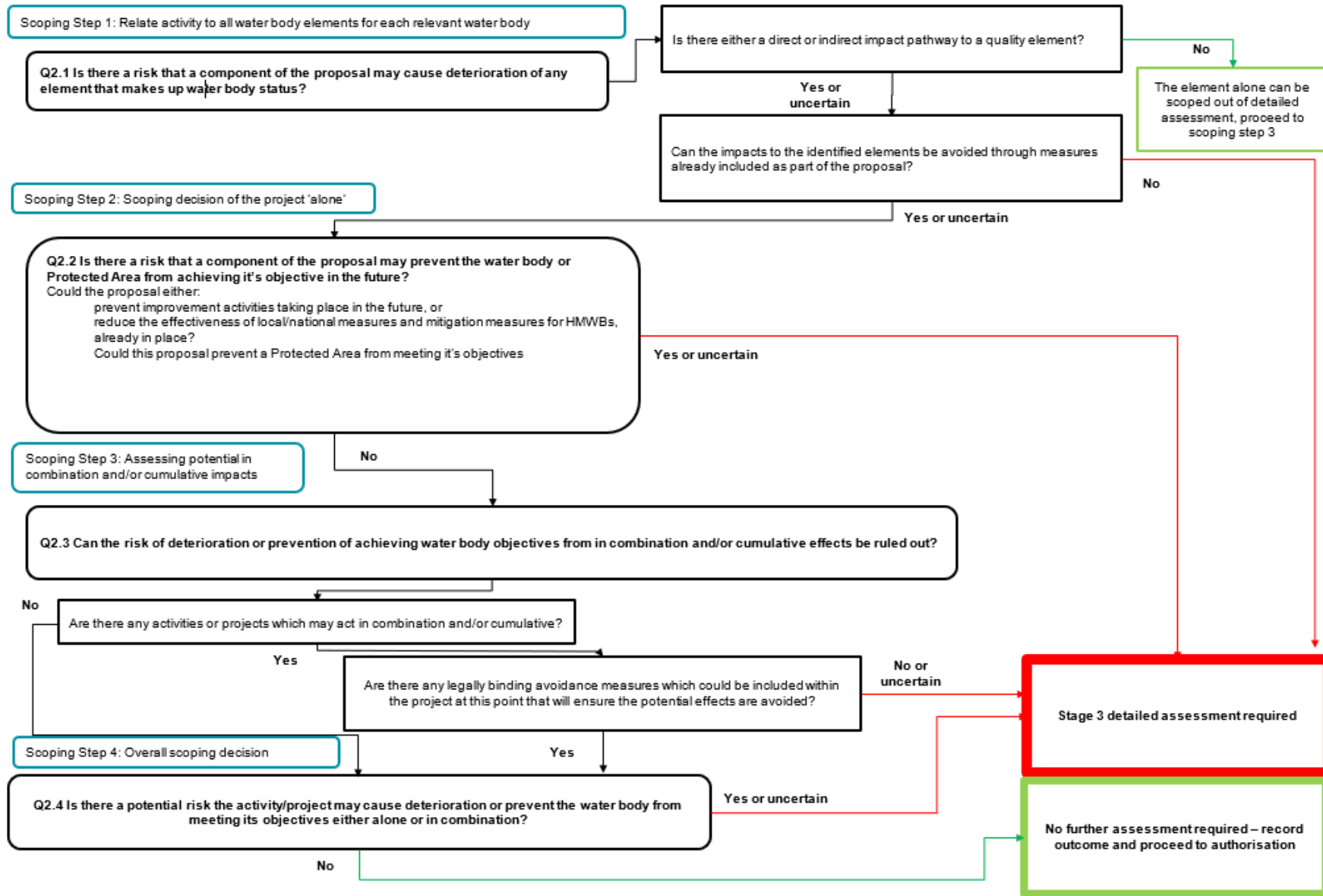


Figure 2: Stage 2 Scoping



WFD Compliance Assessment of Pile repairs at the Valero Pembrokeshire Oil Terminal Ltd. Jetty Berth 2

Stage 1 step 1: proposal details.

Project details where an <u>external party</u> has applied to NRW for any form of authorisation		
Project details	Application reference number (if applicable)	CML2566
	Date application received	Received: 06 November 2025 Duly Made: 18 November 2025
	Applicant details	DragonLNG Limited
	Activity proposed	<p>DragonLNG is looking to undertake repairs for their jetty at Milford Haven in Pembrokeshire. The jetty was constructed in the 1960s, built of steel piles, with a concrete roadway on top. Recent observations have identified potential issues with the integrity of the concrete roadway.</p> <p>In response, DragonLNG is looking to undertake an inspection of the jetty and carry out any subsequent repairs. The inspection and repair works would be undertaken during the low shipping period (May to September) and are expected to last up to four years from 2027 to 2030.</p>
	Relevant legislation	<i>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</i>
	List other permissions that may be required where known	N/A
	Location (include map where appropriate)	DragonLNG Jetty, Milford Haven



Application documents

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

- CML2566 - DragonLNG Jetty repairs ML application form 1F
- CML2566 - Updated Coordinates
- CML2566 - PC7468-HAS-XX-XX-DR-GS-0001_LocationPlan ML
- CML2566 - eng-marine-inns-biosecurity-ra-and-management-plan
- CML2566 - PC7468-RHD-XX-XX-RP-EV-0001-Jetty Improvement Marine Licence WERCA
- CML2566 - PC7468-RHD-XX-XX-RP-EV-0002-Jetty Improvement Marine Licence HRA
- CML2566 - welsh-national-marine-plan-signposting-en-only

Environmental Statement

N/A

List ongoing maintenance requirements. All structures will require maintenance

N/A

Timing of works

The inspection and repair works would be undertaken during the low shipping period (May to September) and are expected to last up to four years from 2027 to 2030.

Pre-application correspondence

N/A

NRW team responsible for drafting

Jack Thompson - Marine Licensing Team

	this WFD Compliance Assessment report, and name of lead officer	
	Date of assessment	08 December 2025

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

Date of classification information: Cycle 3 2024

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
GB531006114100	Milford Haven Inner	Transitional	Western Wales	No - Natural	Moderate	Moderate	Moderate	Assume good	Proposal is: <ul style="list-style-type: none"> adjacent to the water body
GB641008220000	Milford Haven Outer	Coastal	Western Wales	No - Natural	Moderate	Moderate	High		Proposal is: <ul style="list-style-type: none"> within 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	No – go to Q1.2

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.2	Is the activity listed in Annex D as a green activity? Complete new row for each activity		No – complete scoping assessment for each water body
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
Q1.5	Record best practice measures that the works include to help achieve the objectives of the water body.	Include all measures then proceed to Authorisation section	

**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

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

Scoping table for 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 	N/A – no impact pathway	All activities will take place above the water’s surface and within the jetty’s footprint. As such, there will be no direct interaction with the waterbody and therefore, no potential for the project to impact hydromorphology.	Scoped out
<ul style="list-style-type: none"> • tidal patterns, for example, dominant currents 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • freshwater flow 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • wave exposure 	N/A – no impact pathway		Scoped out
Is the proposal in a HMWB?	No		

Scoping table for 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)
----------	------------	--	--

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) 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • thermal conditions (including shading) 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • oxygen levels – dissolved oxygen conditions 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • nutrients - dissolved inorganic nitrogen 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • microbial patterns 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • salinity/conductivity 	N/A – no impact pathway		Scoped out
<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 – no impact pathway		Scoped out
<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 – no impact pathway		Scoped out

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:

Scoping table for 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"> chemicals are on the Environmental Quality Standards Directive (EQSD) list 	N/A – no impact pathway	All activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the seabed.	Scoped out
<ul style="list-style-type: none"> activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). 	N/A – no impact pathway		Scoped out
<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. 	N/A – no impact pathway		Scoped out
<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 	Direct – risk of direct impact	There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as	The applicant has proposed a series of mitigation measures to prevent risk of pollution. Water misting systems and wet cutting techniques will be used to suppress dust
<ul style="list-style-type: none"> changes to the composition and abundance of benthic invertebrate fauna 			

Scoping table for 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>the introduction of liquid concrete during pumping.</p>	<p>during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>Conditions related to the use of concrete will also be included:</p> <p><i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are</i></p>

Scoping table for 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>discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i></p> <p style="color: green;">Scoped out</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:			
• 0.5km ² or larger	N/A		
• 1% or more of the water body's area	N/A		
• Within 500m of any higher sensitivity habitat (see table below)	Yes		The works are located within 20 of reef habitat however, all activities will take place above the water's surface and within the jetty's footprint. As such, there

Scoping table for 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>will be no direct interaction with the waterbody and therefore, no potential for habitat loss.</p> <p>There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping. However, the applicant has proposed a series of mitigation measures to prevent risk of pollution and standard pollution prevention conditions will be included in the licence.</p> <p style="color: green;">Scoped out</p>
<ul style="list-style-type: none"> 1% or more of any lower sensitivity habitat (see table below) 	N/A		
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 – risk of direct impact	<p>There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.</p>	<p>The applicant has proposed a series of mitigation measures to prevent risk of pollution.</p> <p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p>

Scoping table for 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>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>Conditions related to the use of concrete will also be included:</p> <p><i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or</i></p>

Scoping table for 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>surface water drain to minimise the risk of runoff entering a watercourse.</i></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i></p> <p style="color: green;">Scoped out</p>
<ul style="list-style-type: none"> • entrainment or impingement of fish 	N/A		
<ul style="list-style-type: none"> • refuge/predation areas 	N/A		
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	N/A		

Scoping table for Transitional 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)
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:			
<ul style="list-style-type: none"> morphological conditions, for example depth variation, the seabed and intertidal zone structure 	N/A – no impact pathway	No overlap with the water body.	Scoped out
<ul style="list-style-type: none"> tidal patterns, for example, dominant currents 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> freshwater flow 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> wave exposure 	N/A – no impact pathway		Scoped out
Is the proposal in a HMWB?	N/A		

Scoping table for Transitional 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)
----------	------------	--	--

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) 	N/A – no impact pathway	No overlap with the water body.	Scoped out
<ul style="list-style-type: none"> thermal conditions (including shading) 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> oxygen levels – dissolved oxygen conditions 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> nutrients - dissolved inorganic nitrogen 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> microbial patterns 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> salinity/conductivity 	N/A – no impact pathway		Scoped out
<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 – no impact pathway		Scoped out
<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; 	N/A – no impact pathway		Scoped out

Scoping table for Transitional 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)
however, local water quality officers will be able to help).			
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
<ul style="list-style-type: none"> chemicals are on the Environmental Quality Standards Directive (EQSD) list 	N/A – no impact pathway		Scoped in
<ul style="list-style-type: none"> activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). 	N/A – no impact pathway		Scoped in
<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. 	N/A – no impact pathway		Scoped out
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: <ul style="list-style-type: none"> 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 – risk of direct impact	There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from	The applicant has proposed a series of mitigation measures to prevent risk of pollution.
<ul style="list-style-type: none"> changes to the composition and abundance of benthic invertebrate fauna 			

Scoping table for Transitional 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>machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.</p>	<p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>Conditions related to the use of concrete will also be included:</p> <p><i>The Licence Holder must ensure that no waste concrete slurry or wash water from</i></p>

Scoping table for Transitional 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 use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i></p> <p>Scoped out</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 	<p>N/A</p>		<p>Scoped out</p>
<ul style="list-style-type: none"> 1% or more of the water body's area 	<p>N/A</p>		<p>Scoped out</p>
<ul style="list-style-type: none"> Within 500m of any higher sensitivity habitat (see table below) 	<p>Yes</p>		<p>The works are located within 20 of reef habitat however, all activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the</p>

Scoping table for Transitional 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>waterbody and therefore, no potential for habitat loss.</p> <p>There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping. However, the applicant has proposed a series of mitigation measures to prevent risk of pollution and standard pollution prevention conditions will be included in the licence.</p> <p style="color: green;">Scoped out</p>
<ul style="list-style-type: none"> 1% or more of any lower sensitivity habitat (see table below) 	N/A		Scoped out
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 – risk of direct impact	<p>There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.</p>	<p>The applicant has proposed a series of mitigation measures to prevent risk of pollution.</p> <p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at</p>

Scoping table for Transitional 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>every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>Conditions related to the use of concrete will also be included:</p> <p><i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i></p>

Scoping table for Transitional 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 concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i></p> <p>Scoped out</p>
<ul style="list-style-type: none"> • entrainment or impingement of fish 	N/A – no impact pathway		Scoped out
<ul style="list-style-type: none"> • refuge/predation areas 	N/A – no impact pathway		Scoped out
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	N/A		Scoped out

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

Higher sensitivity habitats ²	Lower sensitivity habitats ³
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	See HRA
• Bathing Waters	No	
• Shellfish Waters	No	
Other Protected and Priority habitats and species.		
• Nationally or locally protected areas e.g. SSSI, NNR etc	No	
<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> <p>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.</p>		
• Section 7 list of priority habitats e.g. wetlands	Yes	There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping. However, suitable mitigation has been proposed and standard pollution prevention conditions will be placed on the licence.
• Section 7 list of priority species e.g. water voles	Yes	
<p>Ecosystem Resilience The Environment (Wales) Act 2016, Section 3 states that the objective of the sustainable management of natural resources is to maintain and enhance the resilience of ecosystems and the benefits they provide now and for future generations</p>		
Consideration of ecosystem resilience – diversity, extent, condition, connectivity.		Although the project may directly impact priority habitat or species, the extent or physical impact of a project is minimal.

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?

If none, put 'N/A'

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'

<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>
N/A			
<p>Scoping decision of the project cumulatively or 'in combination'</p>		<p>Potential cumulative/in combination impacts conclusion</p>	
<p>Q2.3 Can the risk of deterioration or prevention of achieving water body objectives from in combination and or cumulative effects be ruled out?</p>	<p>(a) If the right-hand column is 'YES' in all cases</p>	<p>It can be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out</p>	
	<p>(b) If any row is 'NO' or 'Don't know' in the right-hand column</p>	<p>It cannot be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out</p>	

Stage 2, Step 4: Overall scoping decision

Scoping assessment	Scoping decisions
<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> <p>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.</p> <p>If this section is selected, complete Q2.5.</p>

Conclusion of WFD Compliance Assessment & Authorisation

<p>WFD stage 1 screening has been completed and the activity/project have been ruled out as not requiring any further WFD assessment. Or, further assessment is not required because there is no conceivable impact pathway to any water body or Protected Area.</p>
<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>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.</p>

~~In light of the conclusions of the detailed compliance assessment, it has not been ascertained that the project has no potential to cause deterioration or prevent water bodies or WFD Protected Areas from meeting their objectives, as documented in stage 3 of this form. If the conclusion of stage 3 detailed compliance assessment identifies a risk of deterioration of one or more water bodies that cannot be mitigated or may prevent a water body or WFD Protected Area from meeting its objectives, then approval for the project cannot be given unless either:~~

- ~~• the project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of deterioration or prevention of achievement of objectives, and a revised compliance assessment report is prepared, or~~
- ~~• the project satisfies the requirements of Article 4.7 (including 4.8 & 4.9) of the Water Framework Directive, and is approved by the NRW executive team.~~

Completed by	Jack Thompson
Job title	Senior Marine Licensing Officer
Date	08 December 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
Section 1, Step 2	23 December 2025	Chemical status of Milford Haven Outer changed from 'moderate' to 'high'.

*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

To: Jack Thompson - Marine Licensing Team
From: Bridget Randall-Smith - Marine Area Management and Advice Team
Date: 22/12/2025
Response to email from Marine Licensing dated 12/12/2025
Consultation: Dragon LNG Jetty Repairs
Application Reference: CML2566
Applicant: Dragon LNG Limited

1. EU Water Framework Directive (Directive No.2000/60/EC)

- NRW (A) agree in principle with the conclusion of the WFD undertaken by the Marine Licensing Team.
- However, as a minor a query we question which WFD dataset has been used in the WFD assessment. We note slight differences in the waterbody statuses for the key elements between the WFD assessment provided and the Cycle 3 Rivers and Waterbodies Interim 2024 data ([Water Watch Wales](#)) e.g. according to this latest dataset Milford Haven Outer (GB641008220000) has a Chemical Status of 'High' whilst the WFD lists it as 'Moderate'.