Cyfoeth Naturiol Cymru
Natural Resources Wales

WFD Compliance Assessment

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

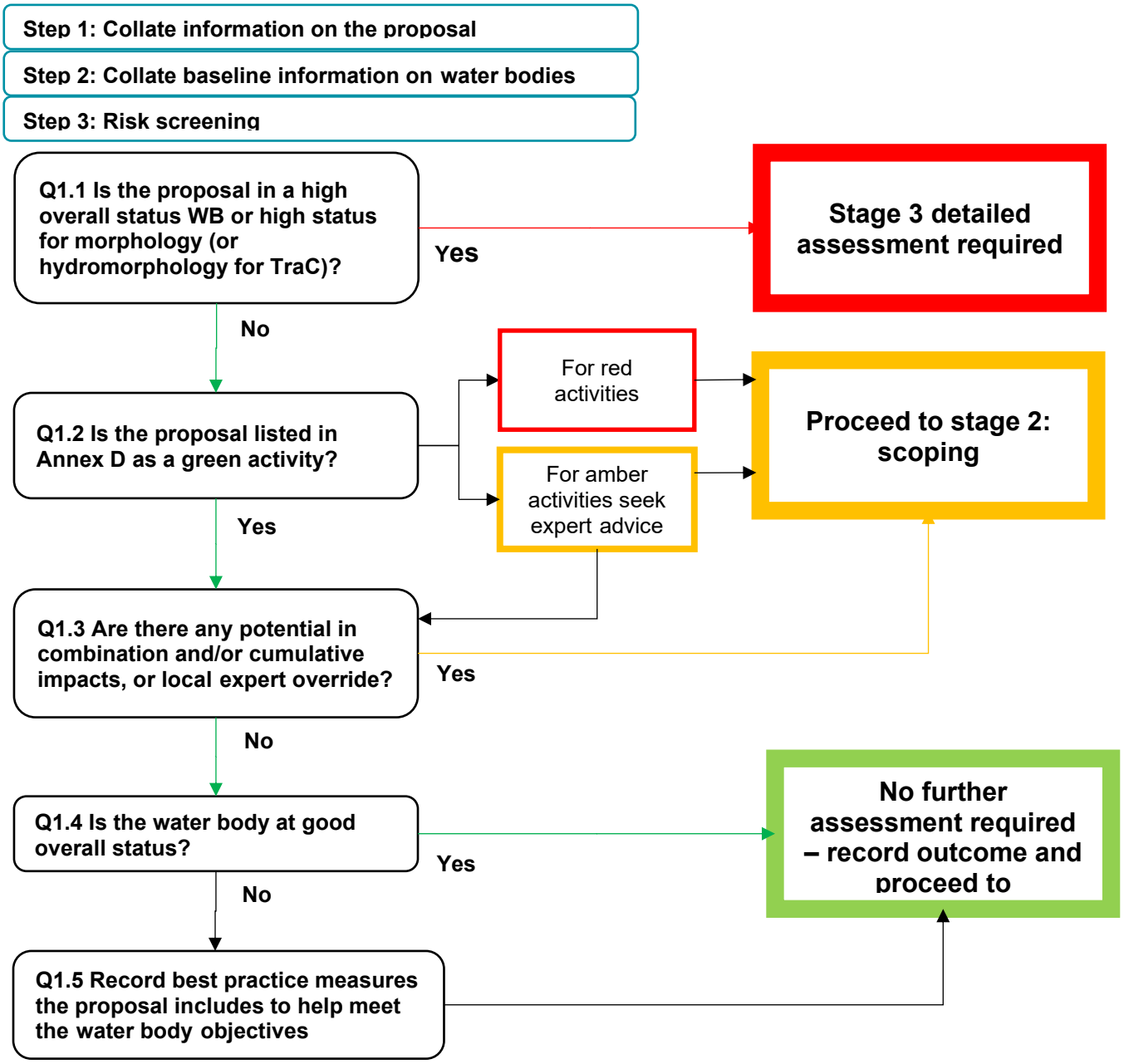
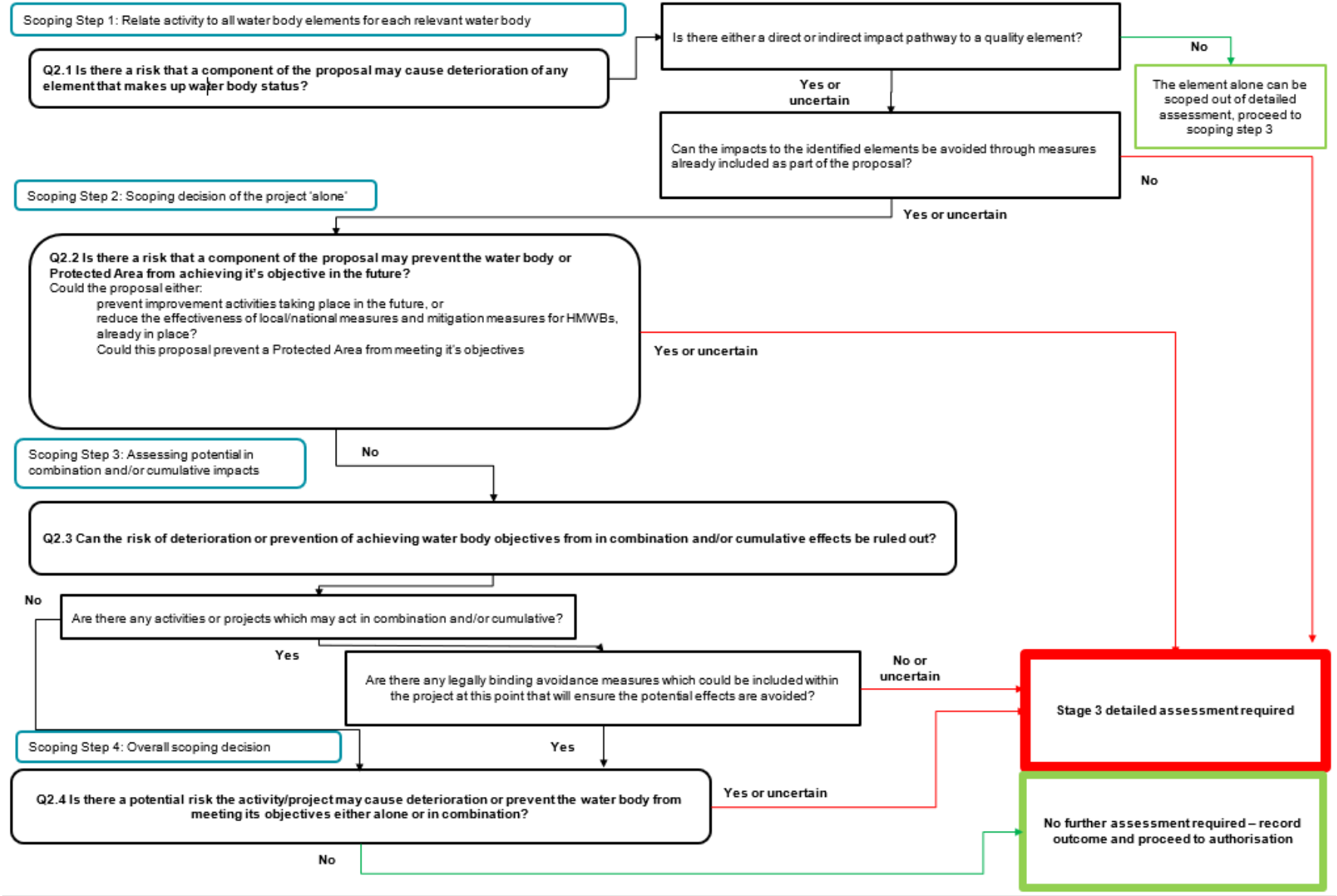


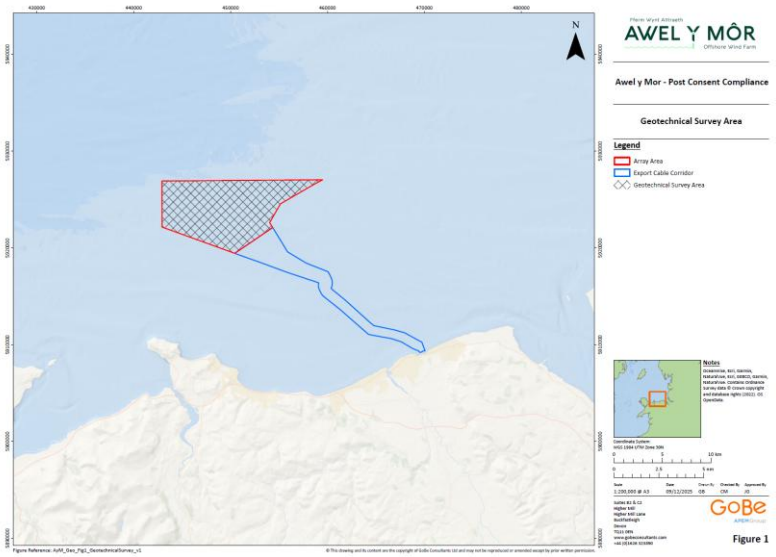
Figure 2: Stage 2 Scoping



WFD Compliance Assessment of Llanbedrog Emergency Overflow pipe repairs

Stage 1 step 1: proposal details.

Project details where an external party has applied to NRW for any form of authorisation		
Project details	**Application reference number (if applicable)**	RML2576
	Date application received	23 December 2025
	Applicant details	Awel y Môr Offshore Windfarm Ltd
	Activity proposed	Offshore geotechnical site investigations will be undertaken to characterise the WTG and OSS locations. The geotechnical survey will comprise of up to 80 vibrocores and up to 265 deep push seafloor Cone Penetration Tests (CPTs), of which, up to 53 will be seismic CPTs. The samples will be located within the Array Area (see below). The exact locations of CPTs and vibrocores have not been determined at this stage. However, wherever possible, they will be evenly distributed around the Array Area in order to gather representative data across the site, and to avoid archaeological features.
	Relevant legislation	*Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy* *The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017*
	List other permissions that may be required where known	N/A
	Location (include map where appropriate)	Awel y Mor Array Area, Irish Sea, North Wales

		 **Latitude** **Longitude** 53.488 -3.860 53.467 -3.860 53.445 -3.859 53.433 -3.798 53.422 -3.746 53.451 -3.692 53.446 -3.687 53.468 -3.676 53.475 -3.655 53.485 -3.627 53.491 -3.610
	Application documents ***Include: Project purpose and background, site map, scaled plan, site photographs and working method statement.***	RML2576 - AyM_Marine_Licence_Application_Form_(Marine_Works)_RevA_2026 (1) (002) RML2576 - 2026-RWE-Awel y Mor-Geotechnical MLA Supporting Environmental Information RML2576 - Copy of AyM_Array_Area_Coordinates_20042023
	Environmental Statement	N/A
	List ongoing maintenance requirements. All structures will require maintenance	N/A
	Timing of works	The geotechnical survey is expected to take place from April 2026 until June 2026. The total offshore survey duration will be

		up to 60 vessel days (including bad weather contingency). However, a licence has been requested up to April 2027 in case of delays.
	Pre-application correspondence	Extensive contact in relation to ORML2233. Consultation with Marine Licensing Team (Microsoft Teams meeting on 10/10/2025) to discuss and agree approach to separate licensing for the 2026 Array Area geotechnical survey. Correspondence from Marine Licensing Team on agreement of this approach (27/11/2025).
	Are the works located within a WFD waterbody? Or do they have the potential to impact upon a WFD water body? Waterbodies include surface waters (rivers, lakes, transitional waters, and coastal waters out to 1 nautical mile) and groundwaters	Yes
	NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Jack Thompson – Marine Licencing Team
	Date of assessment	23 January 2026

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

Date of classification information:

WB ID	Water body name	WB type	Management catchment	HMWB	Overall water body status	Ecological status	Chemical status	Hydro-morphology status*	Relevance to the proposal
GB641011650000	North Wales	Coastal	West Wales	Yes	Moderate	Moderate	High	Not Assessed	Proposal is: • ~9km from the water body

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

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

N/A

Stage 1, Step 3: Risk Screening

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.1	**Is the proposal in a water body at high status or high status for morphology** or hydromorphology?	N/A	**NOT ASSESSED – ASSUME GOOD**
Q1.2	**Is the activity listed in Annex D as a green activity?** Complete new row for each activity	Geotechnical Investigations	**NO**
~~Q1.3~~	~~Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?~~		

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
~~Q1.4~~	~~Is the water body at Good overall status?~~		
~~Q1.5~~	~~Record best practice measures that the works include to help achieve the objectives of the water body.~~		

Stage 2: Scoping Assessment for: North Wales - GB641011650000

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

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

Scoping table for Transitional and Coastal water bodies Water body name: **Tremadog Bay** Water body ID: **GB651009350000**			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
Transitional and Coastal water bodies	Choose one of the following: **Direct** – risk of direct impact **Indirect** – risk of indirect impact **N/A – no impact pathway**	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**

Scoping table for Transitional and Coastal water bodies Water body name: **Tremadog Bay** Water body ID: **GB651009350000**			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
	N/A – other – include additional text to explain		
Hydromorphology – hydromorphology constitutes both 'hydrology' and 'geomorphology' and describes the physical characteristics and processes of a water body. ***Could the proposal lead to changes in:***			
• morphological conditions, for example depth variation, the seabed and intertidal zone structure	**N/A – no impact pathway**	N/A	Due to the small scale and minor nature of the works there is no impact pathway to this element.
• tidal patterns, for example, dominant currents	**N/A – no impact pathway**	N/A	Due to the small scale and minor nature of the works there is no impact pathway to this element.
• freshwater flow	**N/A – no impact pathway**	N/A	Due to the small scale and minor nature of the works there is no impact pathway to this element.
• wave exposure	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
Is the proposal in a HMWB?	**Yes – coastal protection**	N/A	Due to the small scale and minor nature of the works there is no impact pathway to this element.

Scoping table for Transitional and Coastal water bodies

Water body name: **Tremadog Bay**
Water body ID: **GB651009350000**

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

Scoping table for Transitional and Coastal water bodies Water body name: **Tremadog Bay** Water body ID: **GB651009350000**			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
information should be available; however, local water quality officers will be able to help).			
• chemicals are on the Environmental Quality Standards Directive (EQSD) list	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• 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**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• changes to the composition and abundance of aquatic flora	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• changes to the composition and abundance of benthic invertebrate fauna	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• 0.5km^2 or larger	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.

Scoping table for Transitional and Coastal water bodies Water body name: **Tremadog Bay** Water body ID: **GB651009350000**			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
• 1% or more of the water body's area	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• Within 500m of any higher sensitivity habitat (see table below)	**N/A – no impact pathway**	N/A	There are no higher sensitivity habitats within 500m.
• 1% or more of any lower sensitivity habitat (see table below)	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• changes to the composition, abundance and age structure of fish fauna	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• 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)	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• entrainment or impingement of fish	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
• refuge/predation areas	**N/A – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.
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 – no impact pathway**	N/A	Due to the small scale and temporary nature of the works there is no impact pathway to this element.

Info for TraC water bodies
Extract from EA Clearing the water for All
Higher and lower sensitivity habitats for TraC water bodies

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

[2] *Higher sensitivity habitats have a low resistance to, and recovery rate, from human pressures.*
[3] *Lower sensitivity habitats have a medium to high resistance to, and recovery rate from, human pressures.*

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

Protected Areas and Critical sensitive habitats/species Consider if WFD protected areas are at risk from your activity. These include:	Applicable	How have you considered the potential impacts?
Protected Areas:		
• SACs/SPAs/RAMSAR	Yes	Potential impacts considered within HRA.
• Bathing Waters	Yes	Given the short duration of the works and distance to the nearest bathing water, there is unlikely to be a risk to bathers from the works.
• Shellfish Waters	No	The proposal is not located within a Shellfish Waters Protected Area (SWPA)
Other Protected and Priority habitats and species.		
• Nationally or locally protected areas e.g. SSSI, NNR etc	No	N/A
Section 6 Biodiversity and resilience of ecosystems duty (Environment (Wales) Act 2016) here - other Protected and Priority habitats and species.		

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?
The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. Identify if there is a risk that the activity/project could impact on a water dependant priority habitat and or species which are either critical to the ecological health of the water body or sensitive to changes proposed on the water body.		
• Section 7 list of priority habitats e.g. wetlands	Yes	There is no direct overlap between the proposed activities and any Section 7 habitats.
• Section 7 list of priority species e.g. water voles	No	The proposal is not located within proximity to Section 7 species.
Ecosystem Resilience The Environment (Wales) Act 2016, Section 3 states that the objective of the sustainable management of natural resources is to maintain and enhance the resilience of ecosystems and the benefits they provide now and for future generations		
Consideration of ecosystem resilience – diversity, extent, condition, connectivity.	Yes	Due to the small scale and temporary nature of the works no impact pathway is predicted.

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'**
N/A			
Scoping decision of the project cumulatively or 'in combination'		**Potential cumulative/in combination impacts conclusion**	
Q2.3 Can the risk of deterioration or prevention of achieving water body objectives from in combination and or cumulative effects be ruled out?	**(a) If the right-hand column is 'YES' in all cases**	It **can** be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out.	

Stage 2, Step 4: Overall scoping decision

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

Conclusion of WFD Compliance Assessment & Authorisation

In light of the conclusions of a detailed compliance assessment (Stage 3) and taking account of the advice received from technical specialist advisors, it has been established that the activity/project has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives, taking into account any conditions or restrictions as applicable, either alone or in-combination with other activities.	
Completed by	Jack Thompson
Job title	Senior Marine Licensing Officer
Date	23 January 2026

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 1, Step 2	10 March 2026	NRW A noted that the North Wales waterbody is a Heavily Modified water body (HMWB). The table within Stage 1, step 2 of the WFD compliance assessment categorised the WFD waterbody 'North Wales' as '**not** HMWB' – this has now been amended. The ecological status in the same table stated 'good', when it should have been 'moderate' – this has now been amended.

*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