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.**

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Version History			
Document Version	**Date Published**	**Summary of Changes**	**Authorised by**
1	September 2020	Document created and ready for trialling	
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WFD Compliance Assessment template

Contents

Figure 1: Stage 1 Screening

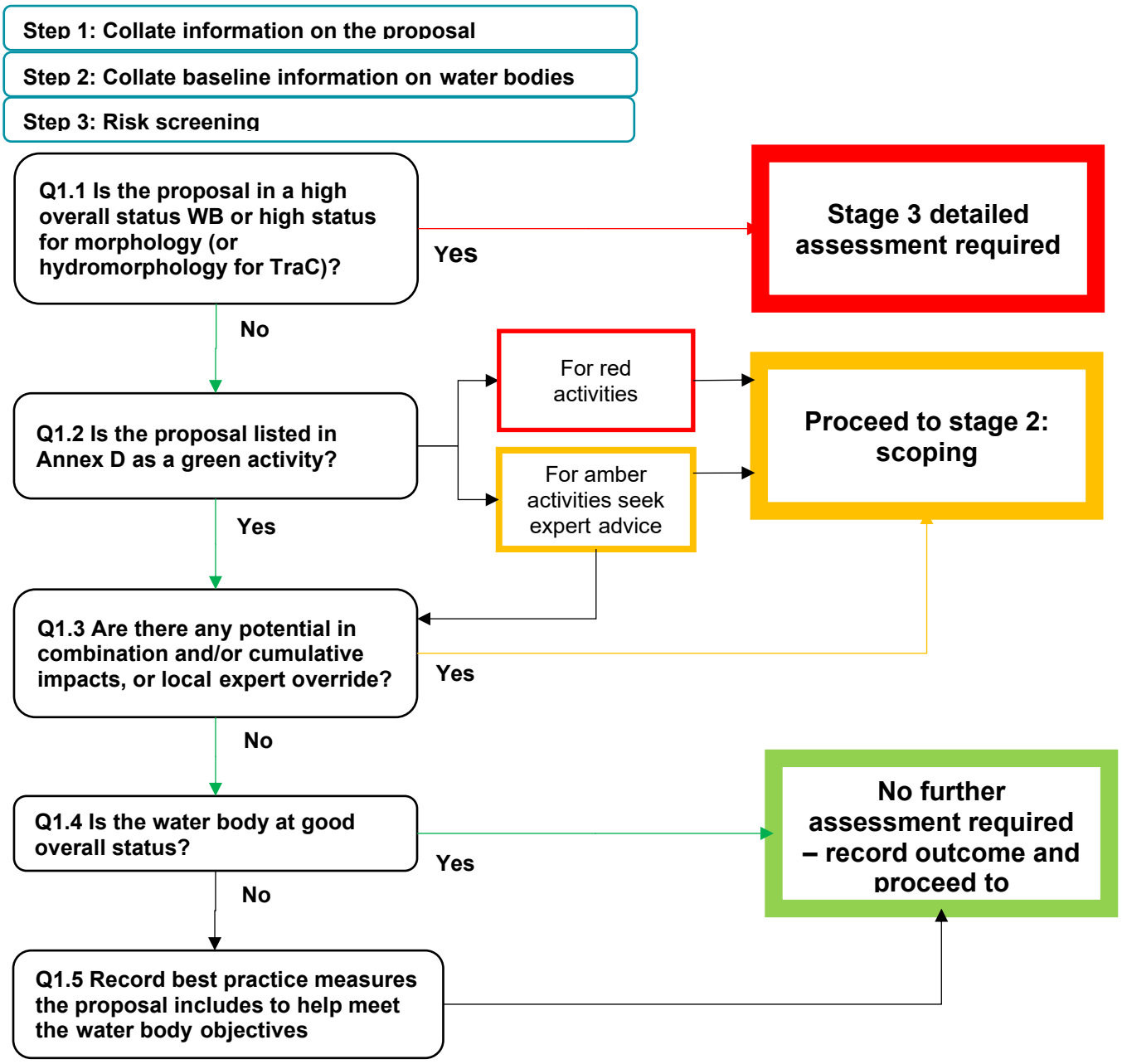
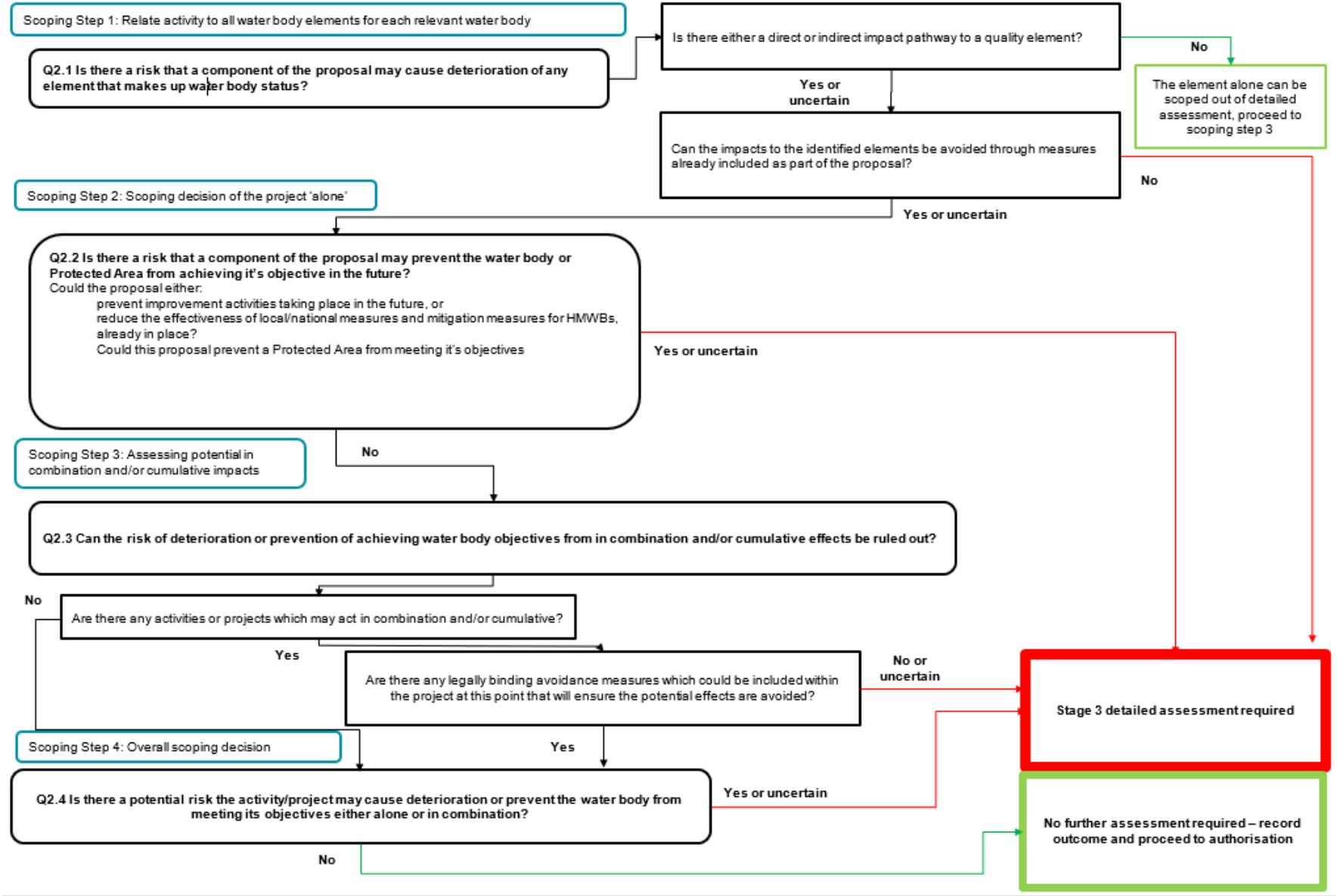


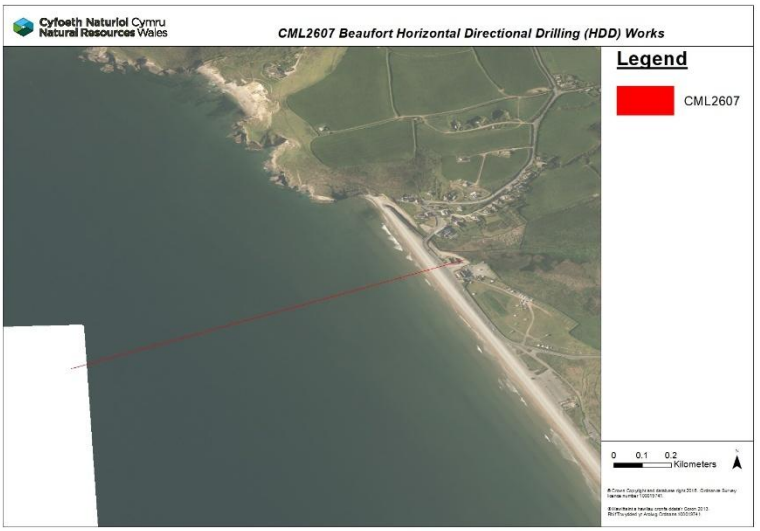
Figure 2: Stage 2 Scoping



WFD Compliance Assessment

Stage 1 step 1: proposal details.

a): Project details where an external party has applied to NRW for any form of authorisation		
Project details	**Application reference number (if applicable)**	CML2607
	Date application received	25 February 2026
	Applicant details	Apollo Submarine Cable System Limited
	Activity proposed	To facilitate improved internet connectivity, Vodafone is proposing the installation of a fibreoptic telecommunications cable from Kilmore Quay, Wexford, Ireland to Newgale, Pembrokeshire. Prior to the cable's installation, Horizontal Directional Drilling works are proposed to install cable ducting, through which the cable will later be fed. The cable will come ashore through the car park of the Newsurf Shop (above MHWS), where it will be connected to the onshore infrastructure. This application is for the HDD works only. Within the Newsurf Shop car park, an area approximately 50 m x 50 m for the operation of the drilling rig and support equipment/vehicles will be required. From here, the drilling operation will begin by drilling a pilot hole. Then, the drilling will be carried out continuously in intervals of 9.5 metres, equivalent to one length of drill pipe, until the Bottom Hole Assembly, (BHA), is at an along hole length of roughly 300 m, (i.e., horizontal at the end of the Entry Curve). The drill string will then continue to punch out on the seabed at a drilled length of 920 m. The HDD will exit from a subsea point approximately 920 m from shore, the exact location of which will be confirmed using a Multibeam Echo Sounder (MBES). Once confirmed, a dive vessel will be mobilised to this exit point, and divers will attach air bags to the Bottom Hole Assembly (BHA). The BHA can then by floated to the surface and retrieved and a bell mouth will be attached to the drill pipe. At the exit point, a marker buoy will be attached to a clump weight to indicate the location.
	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	N/A

	required where known	
	Location	Newgale Beach, Pembrokeshire 51.856844 -5.1259123 51.853453 -5.1381659 51.856842 -5.1259165 51.853458 -5.1381681 
	Application documents *Include: Project purpose and background, site map, scaled plan, site photographs and working method statement.*	CML2607 - eng-marine-works-licence-application-Beaufort_Final_v1.0 _signed_Redacted (value only)_Redacted (full) CML2607 - OCU-HS-S1-FRM-035 Method Statement Risk Assessment - Newgale Rev1 CML2607 - P19421 - Report to Inform Habitats Regulations Assessment_Beaufort_v1.0Final-compressed CML2607 - P19421 - Beaufort HDD Consenting - Water Framework Directive Report_v1.0Final-compressed CML2607 - P19421 - Beaufort Marine Plan Policy Assessment_v1.0Final CML2607 - eng-marine-inns-biosecurity-ra-and-management-plan review-Final CML2607 - P19421 - Consultation and Responses_v1.0Final_Redacted-compressed
	Environmental Statement	N/A
	List ongoing maintenance requirements. All structures will require maintenance	N/A
	Timing of works	The HDD works are expected to commence in September 2026 and are anticipated to last approximately 57 days in

		total, including site mobilisation, construction, MBES surveys and demobilisation from site.
	Pre-application correspondence	See “CML2607 - P19421 - Consultation and Responses_v1.0Final_Redacted-compressed
	Are the works located within a WFD waterbody? Or do they have the potential to impact upon a WFD water body? Waterbodies include surface waters (rivers, lakes, transitional waters, and coastal waters out to 1 nautical mile) and groundwaters	The punch out hole for the HDD is located within the Pembrokeshire South coastal water body.
	NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Jack Thompson – Marine Licensing Team
	Date of assessment	26 March 2026

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

Date of classification information: WFD 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
GB611008590003	Pembrokeshire South	Coastal	Western Wales	No	Good	Good	Good	High	Proposal is: • in the water body

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

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

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?	HDD	**Yes – complete detailed assessment for each water body**
~~Q1.2~~	~~**Is the activity listed in Annex D as a green activity?**~~ ~~Complete new row for each activity~~		~~**Yes** – go to Q1.3~~ ~~**No – complete scoping assessment for each water body**~~ ~~For amber activities then seek expert advice~~
~~Q1.3~~	~~Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?~~	~~**Yes/No**~~	~~**Yes – complete scoping assessment for each water body**~~ ~~**No** – go to Q1.4~~
~~Q1.4~~	~~Is the water body at Good overall status?~~	~~**Yes/No**~~	~~**Yes, no further WFD assessment needed - Go to Authorisation**~~ ~~**No** - Go to Q1.5~~

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
~~Q1.5~~	~~Record best practice measures that the works include to help achieve the objectives of the water body.~~	~~Include all measures then proceed to Authorisation section~~	

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

Stage 2: Scoping Assessment

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

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

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
Transitional and Coastal water bodies	Choose one of the following: **Direct** – risk of direct impact **Indirect** – risk of indirect impact **N/A – no impact pathway** **N/A – other** – include additional text to explain	Further detail on potential impacts. Where N/A is included then provide detail to explain.	**Colour text in green if all impacts can be avoided through measures already included in the scheme. Or red for schemes which require detailed assessment**
Hydromorphology – hydromorphology constitutes both 'hydrology' and 'geomorphology' and describes the physical characteristics and processes of a water body. ***Could the proposal lead to changes in:***			
• morphological conditions, for example depth variation, the seabed and intertidal zone structure	Direct	All proposed works are temporary and small in scale. While the overall timeframe is classified as medium term, the impact to the seabed will only occur when the drill reaches the Exit Point	
• tidal patterns, for example, dominant currents			

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
Elements	**Applicable**	**Potential Impact** (include direct and indirect potential impacts)	**Avoidance measures** (briefly describe any measure included within the project at this point that will ensure the potential effects are avoided)
• freshwater flow • wave exposure		and breaches the surface which will be at the very end of the overall timeframe. Whilst the drill exit point will be permanent, it is not expected to result in any changes to hydromorphological conditions within wider marine area or the Pembrokeshire South water body. The Exit Point of the drill and clump weight (160 cm x 116 cm surface area) will have a low profile and not significantly protrude from the seabed (500 mm in height). The presence of the proposed activities will not reduce the 6 m water depth of the exit.	
Is the proposal in a HMWB?	No		
Water quality An activity can modify the flow of water, introduce artificial materials or remove sediment and/or vegetation. These can all affect the water quality – particularly physico-chemical aspects of water quality - such as levels of dissolved oxygen, nutrients and ammonia. Include water quality in the detailed assessment if the activity could affect:			
• water clarity (turbidity or suspended particulate matter concentration) • thermal conditions (including shading) • oxygen levels – dissolved oxygen conditions • nutrients - dissolved inorganic nitrogen • microbial patterns • salinity/conductivity	Direct	There will be a short-term impacts at the drill Exit Point when the drill breached the surface of the seabed and the clump weight (160 cm x 116 cm surface area) is attached, however this will not be continuous. This will include small, localised increases in SSC and associated bentonite, which is also a fine particle. As the potential impacts are short-term and temporary, no long-term changes to water clarity, thermal	Mitigation measures, in-line with best practice guidance from CIRIA and Guidance for Pollution Prevention have been embedded into the construction methods for both the Onshore Activities and the Marine Activities, such that the likelihood of occurrence of detrimental impacts is considered to be very low.

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
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)
• is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad • 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).		conditions, oxygen levels, nutrients, microbial patterns or salinity/conductivity are expected. The water body is classified as High for phytoplankton, however, the proposed drilling work will not introduce new nutrients or contaminants, and any temporary increase in suspended sediment will be negligible and highly localised to the seabed. No pathways exist for effects on phytoplankton, and no deterioration in status is anticipated. There is no history of harmful algae within this waterbody.	
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
• chemicals are on the Environmental Quality Standards Directive (EQSD) list • activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). • 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.	Indirect	Bentonite drilling solution will be used during the drilling process. Chemicals on the EQSD list used within the proposed works could be derived fromplant and equipment fuel. However, the ground-penetrating works will take place roughly 60 m from the water body itself and the following measures will be implemented to prevent any release of fuel into the water column: • No refuelling within 30 m of a watercourse • Spill kits and spill kit bins will be available at the point of works	Mitigation measures, in-line with best practice guidance from CIRIA and Guidance for Pollution Prevention have been embedded into the construction methods for both the Onshore Activities and the Marine Activities, such that the likelihood of occurrence of detrimental impacts is considered to be very low.

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
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)
		• All spillages shall be dealt with in accordance with the Pollution Prevention Procedure and follow the steps; Stop, Contain, Divert, Contact and Disposal. The activity does not include a discharge pipe or outfall, and therefore no chemicals will be released into the marine environment.	
Biology Identify if the activity or project could impact on the abundance or composition of the biological elements listed below: Biological elements for transitional (T) and coastal (C) waters under the directive are: • Benthic invertebrates (T, C) • Fish (T) • Phytoplankton (T, C) • Macroalgae (T, C) • Angiosperms (T, C) ***Could the proposal lead to:***			
• changes to the composition and abundance of aquatic flora • changes to the composition and abundance of benthic invertebrate fauna	Direct	The works are small scale, temporary and short-term. The punch out point does not overlap with any benthic habitats and the physical disturbance caused by the punch out point is very highly localised. No impacts to the abundance of aquatic or benthic flora or fauna are anticipated.	Mitigation measures, in-line with best practice guidance from CIRIA and Guidance for Pollution Prevention have been embedded into the construction methods for both the Onshore Activities and the Marine Activities, such that the likelihood of occurrence of detrimental impacts is considered to be very low.
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 • 1% or more of the water body's area	No	The footprint is less than 0.5 km$_2$ and <1% of the water body's area. Total area of the entire drilling	

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
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)
		activities (including on land) is 0.066 km^2.	
• Within 500m of any higher sensitivity habitat (see table below)	No	Although the exact location of the drill Exit Point is not known, it will be within the designated works area located more than 500 m away from any higher sensitivity habitat.	
• 1% or more of any lower sensitivity habitat (see table below)	No	The lower sensitivity habitat within the Pembrokeshire South water body to be affected by the HDD works is predominantly expected to be 'subtidal soft sediments like sand and mud'. Given the widespread nature of 'subtidal soft sediments like sand and mud' within the Pembrokeshire South water body, the activity will not exceed 1% of any lower sensitivity habitat.	
Fish fauna (Transitional water bodies only): could the proposal lead to:			
• changes to the composition, abundance and age structure of fish fauna	No	The activity is not located within an estuary and is not likely to delay or prevent fish from entering or migrating through the Pembrokeshire South coastal water body and does not include the generation of significant noise or suspended sediments that could cause a barrier to fish movements. The proposed works do not include any potential for entrainment or impingement of fish.	
• 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			
Or: is the proposal in an estuary and could affect fish in the estuary; is outside			

Scoping table for Transitional and Coastal water bodies Water body name: Pembrokeshire South Water body ID: GB611008590003			
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)
the estuary but could delay or prevent fish entering it; or, could affect fish migrating through the estuary			

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.*

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**
Pembrokeshire South - GB611008590003	Direct	Potential for introduction of INNS through HDD operations.	The majority of works are sufficiently removed from the water body so as not to present a pathway for the introduction or spread of INNS. All equipment, materials and Personal Protective Equipment (PPE) used will be in a clean condition prior to their arrival on site, and upon removal from site, to minimise risk of introducing non-native species into the marine environment. A biosecurity risk assessment, "*CML2607 - eng-marine-inns-biosecurity-ra-and-management-plan_final*", was submitted on 15 July 2026 and approved by NRW A. They are satisfied that any risk of introducing INNS has been sufficiently mitigated.

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	Impacts on protected sites have been assessed within the HRA.
• Bathing Waters	Yes	It is recognised that increases in Suspended Sediment Concentration (SSC) have the potential to result in localised changes to bacterial abundance. Any increase in SSC (and potential bacterial contaminants) associated with the proposed works will be temporary, intermittent and highly reversible and deterioration of bathing water quality is unlikely. Mitigation measures, in-line with best practice guidance from CIRIA and Guidance for Pollution Prevention have been embedded into the construction methods for both the Onshore Activities and the Marine Activities, such that the likelihood of occurrence of detrimental impacts is considered to be very low.
• Shellfish Waters	No	
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. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. Identify if there is a risk that the activity/project could impact on a water dependant priority habitat and or species which are either critical to the ecological health of the water body or sensitive to changes proposed on the water body.		
• Section 7 list of priority habitats e.g. wetlands	No	
• Section 7 list of priority species e.g. water voles	No	

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

Scoping assessment	Scoping decisions
Q2.1 Is there a risk that a component of the proposal may cause deterioration of any element that makes up water body status?	**No**
Q2.2 Is there a risk that a component of the proposal may prevent the water body or Protected Area from achieving its objectives in the future?	**No**

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

It is important to consider the in combination and/or cumulative effects of pressures in a water body and the combined impacts of the proposed activity.
Do not include activities which have not yet been applied for, unless the activity is well defined and there are solid reasons for believing that it will be taken forward. Consult with technical advisors as required.

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

Are there any activities or projects which may act in combination and/or cumulative? *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~~	
	~~**(b) If any row is 'NO' or 'Don't know' in the right-hand column**~~	~~It **cannot** be concluded that potential deterioration or prevention of achieving water body objectives from in combination / cumulative effects can be ruled out~~	

Stage 2, Step 4: Overall scoping decision

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

Stage 3: Detailed Assessment

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

Assessing for Deterioration

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

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

Consider if the effects arising from the project are:

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

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

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

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

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

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

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

Stage 3 decision table.

Water body name & ID	WFD element/s scoped in	Description of impacts; include a list of all evidence documents to inform the detailed assessment	Mitigation measures	Is there risk of the activity preventing the water body/ PA from meeting its objectives?* 'YES' or 'NO'	Can the risk of deterioration be ruled out?* 'YES' or 'NO'
Pembrokeshire South - GB611008590003	N/A	The works are small scale, temporary and short-term. The punch out point does not overlap with any benthic habitats and the	N/A	NO	YES

		physical disturbance caused by the punch out point is very highly localised. Mitigation measures, in-line with best practice guidance from CIRIA and Guidance for Pollution Prevention have been embedded into the construction methods for both the Onshore Activities and the Marine Activities, such that the likelihood of occurrence of detrimental impacts is considered to be very low.			

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

Conclusion of WFD Compliance Assessment & Authorisation

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	26 March 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 2 and 3	06/05/2026 18/06/2026	Given the the proximity of the ground-penetrating works to the WFD coastal waterbody (approx. 60m), NRW A stated that the project presents a potential pollution risk from drilled material (dust/concrete/sediments). As such, further detail regarding mitigation measures was requested. Applicant submitted an updated MS that was sent to NRW A for review. NRW were satisfied that the previous issues raised had been addressed as specific measures to prevent any drilled materials/disturbed sediments associated with the onshore rig site from entering the watercourse had been included.