

WFD Compliance Assessment

OGN 72 Appendix 2 WFD Compliance Assessment template

- In completing this template for a WFD compliance assessment, refer to OGN72 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	
Review Date: [Month & Year]			

Figure 1: Stage 1 Screening

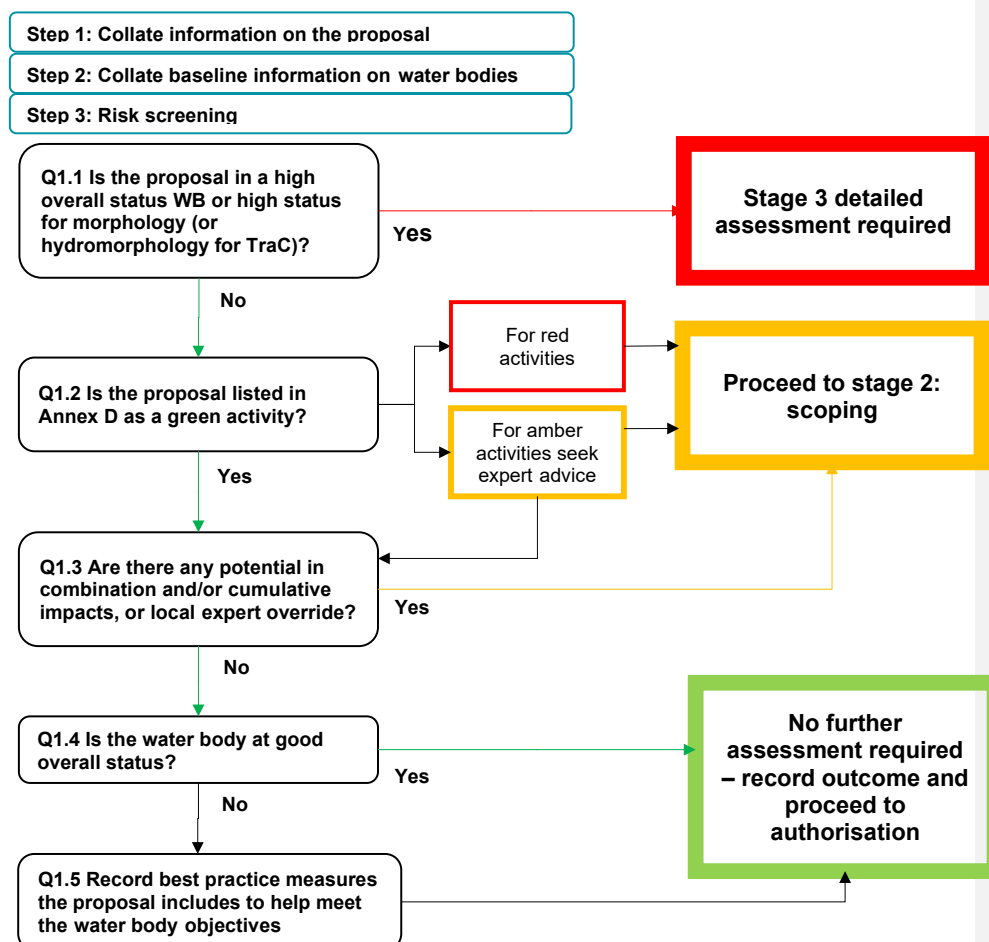
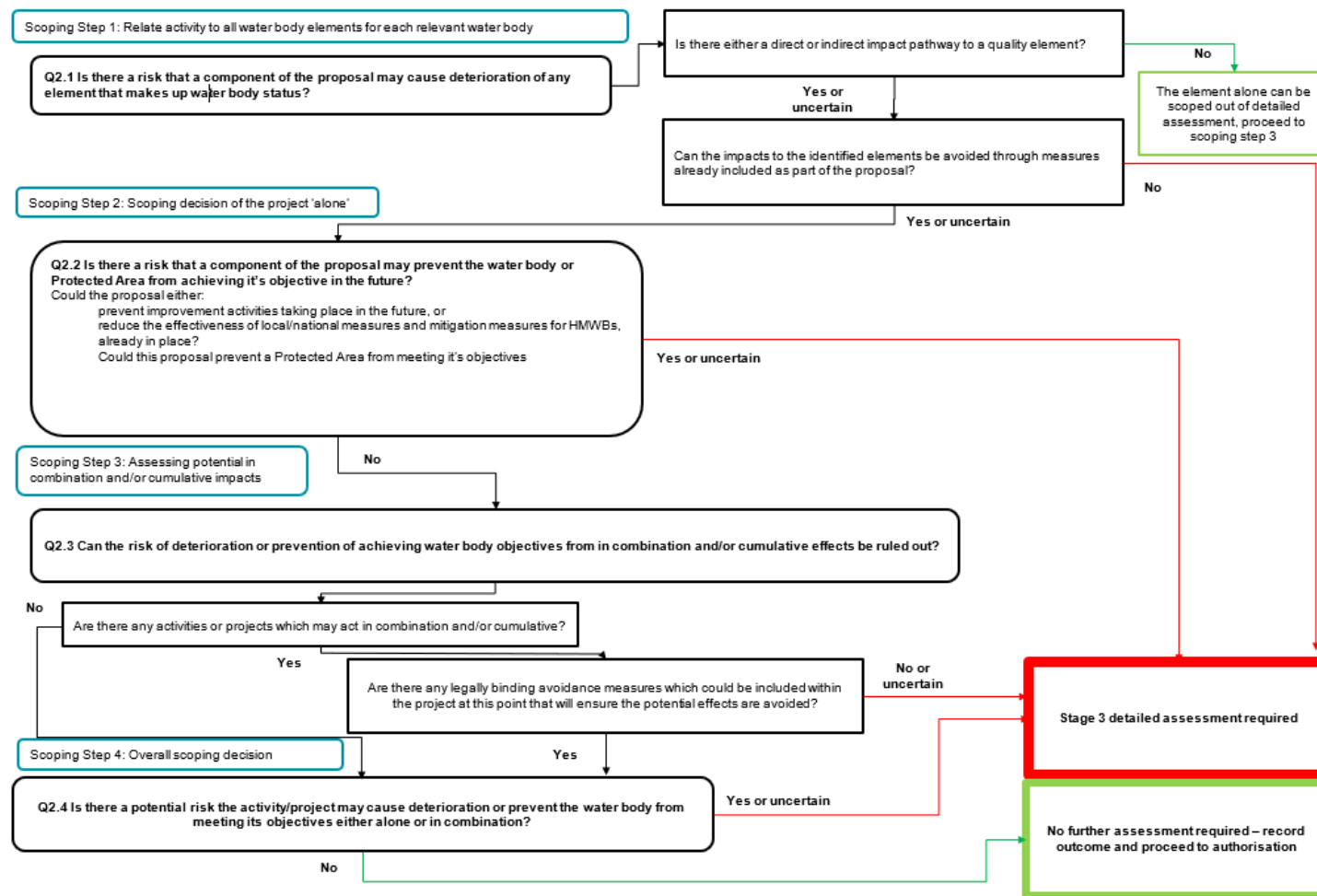


Figure 2: Stage 2 Scoping



WFD Compliance Assessment of Llŷr 1 Floating Offshore Wind Farm Project - Offshore

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)	ORML2465
	Date application received	29/08/2024
	Applicant details	Llŷr Floating Wind Limited
	Activity proposed	The Llŷr 1 Floating Offshore Wind Farm Project (hereafter the "Proposed Project") will provide a facility to demonstrate floating offshore wind technology in Welsh territorial waters. The Project comprises of the construction, installation, operation, maintenance and subsequent decommissioning of up to 10 floating offshore wind turbine generators located approximately 35 km from the Pembrokeshire coast in the Celtic Sea. The offshore infrastructure will include semi-submersible floating platforms and export cables. The offshore Array Area (within which the wind turbine generators, the floating substructures, mooring and the inter array cable arrangements will be installed) comprises of an area of 45 km² and at its closest point, is 35 kilometres (km) from Linney Head (the closest location on the coast of Pembrokeshire) in the Celtic Sea. Water depths across the Array Area range from 65 m to 75 m below Lowest Astronomical Tide (LAT). The proposed project comprises: • Up to 10 Wind Turbine Generators (WTGs), each with a maximum rotor diameter of 285 m. • Up to 10 associated floating platforms. • Up to eight mooring lines, for each floating platform (up to 80 in total). • Up to eight anchors or piles for each floating platform (up to 80 in total). • Up to 11 offshore Inter array cables (IACs), up to 66 kiloVolts (kV) High Voltage Alternating Current (HVAC) (dynamic but with the potential to touch the seabed). • Up to two offshore export cable circuits, up to 132 kV HVAC and approximately 49 km long, will achieve landfall via Horizontal Directional Drilling (HDD) at Freshwater West. • All associated works required to operate, maintain, repair and decommission the proposed project; and • Associated scour and cable protection (if required). This WFD Compliance Assessment covers all components of the project from mean high-water springs (MHWS) at landfall at

Project details where an external party has applied to NRW for any form of authorisation

		Freshwater West, the export cable corridor and the array area. Geophysical works such as bathymetry and multibeam echosounders are <u>not</u> included in the assessment. A separate consent under Section 36 of the Electricity Act with deemed planning permission for the associated onshore infrastructure will be sought. A further detailed description of the proposed Project, including estimated timescales of construction and operation, dimensions of project, quantity of material being deposited and removed is provided within Volume 1 Chapter 4: Description of the Proposed Project, of the Environment Statement (Document Reference ORML2465 - Llyr ES_Ch 04_Project Description_FINAL.pdf)
	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</i> <i>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</i>
	List other permissions that may be required where known	A Section 36 (s.36) consent is required to construct and operate an offshore generating station, under the Electricity Act 1989. This would include deemed planning permission for onshore works. Given that deemed planning permission is being sought, a separate planning application under the Town and Country Planning Act 1990 is not required. The s.36 application will be considered by Planning and Environment Decisions Wales (PEDW), administering consent on behalf of the Welsh Ministers.
	Location (include map where appropriate)	The coordinates for the offshore Development Area have been provided with the Marine Licence application as Latitude and Longitude in decimal degrees to four decimal places. See Document Reference ORML2465 - Continuation sheet 1.pdf. The coordinates are provided in the WGS 84 system. A map of the proposed project offshore Development Area is shown below and provided in Volume 5 Figure 04.1 of the Environmental Statement (Document Reference ORML2465 - Figure 04.1 Proposed project Offshore Development Area.pdf).

Project details where an external party has applied to NRW for any form of authorisation

		
	Application documents <i>Include: Project purpose and background, site map, scaled plan, site photographs and working method statement.</i>	The application documents that have informed this WFD Assessment are as follows: • Application for a Marine Licence for Marine Works (ORML2465 - Llŷr OWF_marine-works-application-form-21 March 2024_V01.pdf) • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 6: Appendix 10D – Offshore Water Framework Directive Assessment • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 1: Chapter 01: Introduction • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 1: Chapter 03: Alternatives • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 1: Chapter 04: Project Description • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 5: Figure 1-1, Site Location • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 3: Chapter 18: Marine Water and Sediment Quality • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 3: Chapter 17: Physical Environment • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 6: Appendix 10D – Offshore Water Framework Directive Assessment. Annex 10D-A Further WFD waterbody information • Volume 5: Figure 18-3 of the ES • Volume 5: Figure 18-4 • Appendix 18C (Benthic Characterisation Survey Report (Ocean Ecology, 2023)) • Appendix 18A • Appendix 18B • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 3: Chapter 19: Benthic Ecology

Project details where an external party has applied to NRW for any form of authorisation

		• Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 3: Chapter 20: Fish and Shellfish Ecology • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 6: Appendix 10C: Onshore Water Framework Directive Assessment • Llŷr 1 Floating Offshore Wind Farm. Consultation Report • Llŷr ES Appendix 5C: EIA Scoping Opinion Responses • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 1: Chapter 06: Consultation and Stakeholder Engagement • ORML2465 P11-LYR-3.4.3-PAP-Rev01-Marine Licence Application Clarifications A2 • ORML2465 P11-LYR-3.4.3-PAP-Rev01-Marine Licence Application Clarifications A3- Public.pdf • ORML2465 P11-LYR-3.4.3-PAP-Rev3-Clarifications 2
	Environmental Statement	Llŷr 1 Floating Wind Farm. Environmental Statement, Volume 6: Appendix 10D – Offshore Water Framework Directive Assessment
	List ongoing maintenance requirements. All structures will require maintenance	N/A
	Timing of works	Offshore construction activities are planned to commence in Q1 2027. The installation of offshore components is likely to be completed over two years, with full commissioning of the wind farm in Q4 2028 before becoming operational for 30 years. An indicative construction programme for the offshore elements is included within Section 4.7.7 of Chapter 04 – Description of the Proposed Project of the ES. The construction timing and methodologies will be fully developed once the project design is finalised and installation contractors are appointed. Similarly, operation and maintenance (O&M) activities will be adjusted to the final, as built, project requirements whilst remaining within the PDE assessed.
	Pre-application correspondence	Extensive consultation has been undertaken with NRW as set out in the following document: • Llŷr 1 Floating Offshore Wind Farm. Environmental Statement, Volume 1: Chapter 06: Consultation and Stakeholder Engagement. Specifically: • Early engagement was undertaken with NRW in 2018-2021 to inform the proposed Project site selection and options development process (described further in Llŷr ES Chapter 03: Alternatives) • A Scoping Report was submitted to NRW in April 2022, to define and agree the approach to the EIA and technical content of the ES • EIA technical engagement was undertaken between May 2022 and March 2024 to address concerns and queries

Project details where an external party has applied to NRW for any form of authorisation

		raised during the Scoping consultation phase and confirm the approach to the EIA (described further in Llŷr ES Appendix 5C: EIA Scoping Opinion Responses and Llŷr ES Chapter 06: Consultation and Stakeholder Engagement) Table 10D-2 of the Llŷr 1 Floating Offshore Wind Farm Environmental Statement, Volume 6: Appendix 10D – Offshore Water Framework Directive Assessment outlines consultation with NRW pertinent to the WFD assessment.
	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	Marine Licensing Team: Joseph Thomas (supported by Anastasia Charalampopoulou – ABPmer)
	Date of assessment	18 March 2026

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

Date of classification information: 2021 (Cycle 3) Classification

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 River Basin Management Plan (RBMP)	No	Good	Good	High	High	Proposal is in the water body
GB641008220000	Milford Haven Outer	Coastal	Western Wales RBMP	No	Moderate	Moderate	Moderate	Not High	Proposal is adjacent to the water body

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

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

- Milford Haven Inner (GB531006114100) was initially considered. However, this waterbody is outside of the Zone of Influence (Zol), defined in the applicant's Offshore WFD Assessment as the extent of one spring tidal excursion limit. This is considered to represent the maximum distance that any measurable plume effects could extend to, or the maximum area for deleterious substances to disperse within, in the marine environment. As this waterbody is outside the Zol it is considered that there is no route to impact (or receptor pathway). However, this waterbody is considered in terms of impacts generated from the onshore environment (e.g. runoff of sediments or spillages) in the applicant's Onshore WFD Assessment (which does not form part of the marine licence application).
- Pickleridge Lagoon (GB610100084000) is at least 8km from the project area and so has not been screened into the WFD assessment. The only pathway with the potential to affect distant waterbodies is the transportation of suspended sediments from installation activities and HDD drilling fluids. However, not only is this WFD waterbody outside the screening distance the location within an inlet on the other side of the entrance to Milford Haven, and any effects are unlikely.

Stage 1, Step 3: Risk Screening

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.1	Is the proposal in a water body at high status or high status for morphology or hydromorphology?	N/A	Yes (Pembrokeshire South is at high status for morphology) – complete detailed assessment for Pembrokeshire South (for morphology element)
Q1.2	Is the activity listed in Annex D as a green activity? Complete new row for each activity	N/A	No – complete scoping assessment for each water body
Q1.3	Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?	N/A	Yes – complete scoping assessment for each water body
Q1.4	Is the water body at Good overall status?		Yes – complete scoping assessment for each water body No – go to Q1.4
Q1.5	Record best practice measures that the works include to help achieve the objectives of the water body.	Yes, no further WFD assessment needed – Go to Authorisation No – Go to Q1.5	

*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 for: Pembrokeshire South GB611008590003

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

Pembrokeshire South Coastal Water Body

Scoping table for Transitional and Coastal water bodies			
Water body name: Pembrokeshire South Coastal 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. <i>Could the proposal lead to changes in:</i>			

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
morphological conditions, for example depth variation, the seabed and intertidal zone structure	Direct	Morphology of the seabed at Freshwater West could theoretically be impacted by HDD excavation and drilling operations. Sediment disturbance will occur during construction, operation, and decommissioning phases. Sediment resuspension is expected during installation surveys, route clearance activities, cable burial activities, anchor deployment, HDD activities, cable maintenance and cable removals and protection measures.	Already taken to detailed assessment as Pembrokeshire South is at high status for morphology (see Screening, Question 1.1).
tidal patterns, for example, dominant currents	Direct		
wave exposure	Direct		
freshwater flow	N/A – no impact pathway	The project activities will not result in any potential changes to freshwater flow.	No - Impact assessment not required.
Is the proposal in a HMWB?	No		No - Impact assessment not required.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
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)	Direct	Water quality could be affected due to an increase in turbidity levels, release of contaminants and leaks and spillage.	When considering embedded mitigation and the good practice mitigation outlined for each individual element assessed (Chapter 18 of the ES: Marine Water and Sediment Quality), no significant effects were identified. Embedded mitigation includes: Drilling fluid – to be suitably selected to minimise environmental damage. Adoption of appropriate third party vessel communication and management to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality. Installation vessel requirements to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality. Site and routing selection and design to minimise potential for disturbance.
• thermal conditions (including shading)	Direct		
• oxygen levels – dissolved oxygen conditions	Indirect	Sediment disturbance will increase turbidity though no significant effects were identified from sediment disturbance within Chapter 18: Marine Water and Sediment Quality of the ES.	
• nutrients - dissolved inorganic nitrogen	Indirect		
• microbial patterns	Indirect	With regard to chemicals, water quality in the area is generally good but does exceed the WFD saline EQS for a number of chemicals. None of the potential impacts within each project phase is expected to contribute towards increasing the levels of any of these chemicals which already exists. Fluid leaks during HDD drilling or pollution events during general construction in the marine environment could lead into impacts on water quality. However, when considering the rapid dispersal of any minor spill within the area, it is unlikely for any leak or spill of a scale associated with the proposed Project to worsen levels of existing chemicals in the area, nor prevent WFD objectives in the area from being achieved.	

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
		Due to the temporary and localised nature of any impacts and the fact that these will rapidly disperse through the water column, the magnitude of impact is considered to be negligible.	Turbine and substructure installation to be undertaken by appropriate vessels in appropriate sea / weather conditions. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. Impact assessment not required.
salinity/conductivity	N/A – no impact pathway		Impact assessment not required.
is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad	No	This waterbody was assigned a phytoplankton status of High in the most recent Classification Cycle (Cycle 3: 2021). Opportunist macroalgae status was not assessed.	Impact assessment not required.
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).	No	This water body does not have a history of harmful algae.	Impact assessment not required.
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
chemicals are on the Environmental Quality Standards Directive (EQSD) list	Direct	From analysis of baseline water quality data, there are a number of instances where EQS are exceeded for the area. When considering the rapid dispersal of any minor accidental spill	Mitigation has been incorporated into the proposed Project to minimise sediment disturbance and prevent pollution events from happening.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
		within the area, it is unlikely for any leak or spill of a scale associated with the proposed Project to worsen levels of existing chemicals in the area, nor prevent WFD objectives in the area from being achieved. Given the good practice and embedded mitigation and the rapid dispersal within the area, there are not anticipated to be any adverse impacts on the scale of the WFD waterbody, and further.	Embedded mitigation includes: Drilling fluid – to be suitably selected to minimise environmental damage. Adoption of appropriate third party vessel communication and management to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality. Installation vessel requirements to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality. Site and routing selection and design to minimise potential for disturbance. Turbine and substructure installation to be undertaken by appropriate vessels in appropriate sea / weather conditions. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. Impact assessment not required.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	Direct	Sediments in the near vicinity of the proposed Project site have been found to exceed Cefas Action Level 1 for a number of contaminants and in one instance exceed Cefas Action Level 2. Any effect from the minimal disturbance of sediment to facilitate the main works is considered to be short-lived and highly localised in nature (within the ZoI). Given the good practice and embedded mitigation and the rapid dispersal within the area, there are not anticipated to be any adverse impacts on the scale of the WFD waterbody, and further.	Although impacts would not be anticipated at the WFD watercourse scale, the embedded mitigation will be applied: Appropriate excavation techniques to minimise adverse effects such as increased turbidity. Cable Burial Risk Assessment – to minimise sediment disturbance where possible. Disturbance from cable protection and scour protection installations – to be minimised through good engineering design practice. A more detailed assessment on this is provided within the Appropriate Assessment. Drilling and piling – to follow good practice protocols. Standard condition to be attached to marine licence. Site and routing selection and design to minimise potential for disturbance. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
			Impact assessment not required.
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	The activity does not include a discharge pipe or outfall, and therefore no chemicals will be released into the marine environment.	Impact assessment not required.
Biology Identify if the activity or project could impact on the abundance or composition of the biological elements listed below: Biological elements for transitional (T) and coastal (C) waters under the directive are: - Benthic invertebrates (T, C) - Fish (T) - Phytoplankton (T, C) - Macroalgae (T, C) - Angiosperms (T, C) Could the proposal lead to:			
changes to the composition and abundance of aquatic flora	Direct	Phytoplankton has not been specifically assessed within the ES. However, considering impacts to hydromorphology and water and sediment quality have been assessed as not significant it can be concluded that any impacts to phytoplankton would also be insignificant. Also taking into account this waterbody was assigned a phytoplankton status of High in the most recent Classification Cycle (Cycle 3: 2021), no further assessment is required for this element.	
changes to the composition and abundance of benthic invertebrate fauna	Direct		

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
		As described in Chapter 19 of the ES: Benthic Ecology, the intertidal area is largely comprised of clean, fine, littoral sandy habitat with typical intertidal infaunal species including polychaetes and isopods. A strip of barren littoral shingle is also present across the upper intertidal zone. To the north and south, Freshwater West is bordered by exposed intertidal rocky shore with areas of shingle and mud. The rocky shore extends around the Angle Peninsula to the north and supports furoid and red seaweeds and communities of intertidal species such as mussels, barnacles and lichens. The subtidal area is dominated by sandy habitats, with small areas of coarse sediments and, in nearshore waters particularly, bedrock habitats. Nearshore seabed habitats to the north and south of Freshwater West consist of rocky substrate in high energy environments. Potential impacts to benthic flora and invertebrate fauna could arise as a result of direct physical disturbance, smothering or abrasion, changes to suspended sediment concentrations, changes to water quality and physical and sediment processes, thermal impacts, EMF impacts and introduction of INNS.	Scoped in for detailed assessment.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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)
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:			
0.5km² or larger	Direct	The applicant states that more than 0.5 km ² of the proposed offshore development footprint (also accounting for temporary benthic habitat disturbance) lies within the Pembrokeshire South waterbody	Taken to detailed assessment
1% or more of the water body's area	Direct	The applicant states that the portion of the proposed Project offshore boundary covers approximately 3% of Pembrokeshire South waterbody.	Taken to detailed assessment
Within 500m of any higher sensitivity habitat (see table below)	Direct	There are no higher sensitivity habitats within 500 m of the activity footprint.	Impact assessment not required.
1% or more of any lower sensitivity habitat (see table below)	Direct	The portion of the proposed Project offshore boundary, covered by lower sensitivity habitats is lower than 1 %.	Impact assessment not required. Nonetheless, the applicant has scoped marine habitats in for detailed assessment.
Fish fauna (Transitional water bodies only): could the proposal lead to:			
changes to the composition, abundance and age structure of fish fauna	N/A		
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		
entrainment or impingement of fish	N/A		
refuge/predation areas	N/A		
Or: is the proposal in an estuary and could affect fish in the estuary; is outside	N/A		

Commented [PM1]: Could probably just delete.

Scoping table for Transitional and Coastal water bodies

Water body name: Pembrokeshire South Coastal

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			

Milford Haven Outer Coastal Water Body

Scoping table for Transitional and Coastal water bodies			
Water body name: Milford Haven Outer Coastal 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>			
morphological conditions, for example depth variation, the seabed and intertidal zone structure	Direct	No direct works will be undertaken within the Milford Haven Outer waterbody though it is within the tidal excursion limit, where sediments or pollution plumes effects could extend.	When considering embedded mitigation and the good practice mitigation outlined for each individual element assessed (Chapter 18: Marine Water and Sediment Quality and Table 10D-15 of the Offshore WFD Assessment), no significant effects were identified. Embedded mitigation includes: Appropriate excavation techniques to minimise adverse effects such as increased turbidity.
tidal patterns, for example, dominant currents	Direct		
wave exposure	Direct	Sediment disturbance will occur during installation, operation, and decommissioning phases. Sediment resuspension is expected during installation surveys, route clearance activities, cable burial activities, anchor deployment, HDD activities, cable maintenance and cable removals and protection measures.	

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
		Sediment plume extent will be largely restricted to the Zol and it is expected for the majority of any sediment plume to settle out within a number of seconds to minutes. When considering embedded mitigation, no significant effects in hydromorphology were identified for any of the project phases.	Cable Burial Risk Assessment – to minimise sediment disturbance where possible. Disturbance from cable protection and scour protection installations – to be minimised through good engineering design practice. Drilling and piling – to follow good practice protocols. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. Impact assessment not required.
• freshwater flow	N/A – no impact pathway	The project activities will not result in any potential changes to freshwater flow.	No - Impact assessment not required.
Is the proposal in a HMWB?	No		Impact assessment not required.
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)	Direct	No direct works will be undertaken within the Milford Haven Outer waterbody though it is within the tidal excursion limit, where	When considering embedded mitigation and the good practice mitigation outlined for each individual element assessed (Chapter 18 of the ES: Marine Water and
• thermal conditions (including shading)	Direct		

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
oxygen levels – dissolved oxygen conditions	Indirect	sediments or pollution plumes effects could extend.	Sediment Quality), no significant effects were identified.
nutrients - dissolved inorganic nitrogen	Indirect	Water quality could be affected due to an increase in turbidity levels, release of contaminants and leaks and spillage.	Embedded mitigation includes:
microbial patterns	Indirect	Sediment disturbance will increase turbidity though similarly to hydromorphology, no significant effects were identified from sediment disturbance.	Drilling fluid – to be suitably selected to minimise environmental damage.
		With regard to chemicals, water quality in the area is generally good but does exceed the WFD saline EQS for a number of chemicals. None of the potential impacts within each project phase is expected to contribute towards increasing the levels of any of these chemicals which already exists.	Adoption of appropriate third party vessel communication and management to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality.
		Fluid leaks during HDD drilling or pollution events during general construction in the marine environment could lead into impacts on water quality. However, when considering the rapid dispersal of any minor spill within the area, it is unlikely for any leak or spill of a scale associated with the proposed Project to worsen levels of existing chemicals in the area, nor prevent WFD objectives in the area from being achieved.	Installation vessel requirements to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality.
			Site and routing selection and design to minimise potential for disturbance.
			Turbine and substructure installation to be undertaken by appropriate vessels in appropriate sea / weather conditions.
			Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan.

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
		Due to the temporary and localised nature of any impacts and the fact that these will rapidly disperse through the water column, the magnitude of impact is considered to be negligible.	Impact assessment not required.
salinity/conductivity	N/A – no impact pathway		Impact assessment not required.
is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad	No	This waterbody was assigned a phytoplankton status of Good and an opportunistic macroalgae status of Good in the most recent Classification Cycle (Cycle 3: 2021).	Impact assessment not required.
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).	No	This water body does not have a history of harmful algae.	Impact assessment not required.
Chemicals - A detailed assessment will also be required if the activity uses or releases chemicals, for example, through sediment disturbance or building works. This is necessary when either the:			
chemicals are on the Environmental Quality Standards Directive (EQSD) list	Direct	From analysis of baseline water quality data, there are a number of instances where EQS are exceeded for the area. When considering the rapid dispersal of any minor accidental spill within the area, it is unlikely for any leak or spill of a scale associated with the proposed Project to worsen levels of existing chemicals in the area, nor prevent WFD objectives in the area from being achieved. Given the good practice and embedded mitigation and the rapid dispersal within the area, there are not anticipated to be any	Mitigation has been incorporated into the proposed Project to minimise sediment disturbance and prevent pollution events from happening. Embedded mitigation includes: Drilling fluid – to be suitably selected to minimise environmental damage. Adoption of appropriate third party vessel communication and management to reduce risk of accidents and collisions

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
		adverse impacts on the scale of the WFD waterbody, and further.	which may lead to spillage and deterioration of water quality. Installation vessel requirements to reduce risk of accidents and collisions which may lead to spillage and deterioration of water quality. Site and routing selection and design to minimise potential for disturbance. Turbine and substructure installation to be undertaken by appropriate vessels in appropriate sea / weather conditions. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. Impact assessment not required.
activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1).	Direct	Raw data provided by NRW has been summarised and is available in Appendix 18B of the ES. The sediment within the Milford Haven Waterway, exceeds Cefas Action Level 1 for a number of determinands. Cefas Action Level 2, however, is only exceeded for levels of cadmium.	Although impacts would not be anticipated at the WFD watercourse scale, the embedded mitigation will be applied: Appropriate excavation techniques to minimise adverse effects such as increased turbidity.

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
		This sampling point is located much further up the estuary than where works are proposed to take place. Any effect from the disturbance of minimal sediment to facilitate the main works is considered to be short-lived and highly localised in nature (within the Zol). Given the good practice and embedded mitigation and the rapid dispersal within the area, there are not anticipated to be any adverse impacts on the scale of the WFD waterbody, and further.	Cable Burial Risk Assessment – to minimise sediment disturbance where possible. Disturbance from cable protection and scour protection installations – to be minimised through good engineering design practice. Drilling and piling – to follow good practice protocols. Site and routing selection and design to minimise potential for disturbance. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. Impact assessment not required.
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	The activity does not include a discharge pipe or outfall, and therefore no chemicals will be released into the marine environment.	Impact assessment not required.

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
Biology Identify if the activity or project could impact on the abundance or composition of the biological elements listed below: Biological elements for transitional (T) and coastal (C) waters under the directive are: - Benthic invertebrates (T, C) - Fish (T) - Phytoplankton (T, C) - Macroalgae (T, C) - Angiosperms (T, C) Could the proposal lead to: - changes to the composition and abundance of aquatic flora			
	Direct	Phytoplankton has not been specifically assessed within the ES. However, considering impacts to hydromorphology and water and sediment quality have been assessed as not significant it can be concluded that any impacts to phytoplankton would also be insignificant. Also taking into account this waterbody was assigned a phytoplankton status of Good in the most recent Classification Cycle (Cycle 3: 2021), no further assessment is required for this element.	
changes to the composition and abundance of benthic invertebrate fauna	Direct	As described in Chapter 19 of the ES: Benthic Ecology, the intertidal area is largely comprised of clean, fine, littoral sandy habitat with typical intertidal infaunal species including polychaetes and isopods. A strip of barren littoral shingle is also present across the upper intertidal zone. To the north and south, Freshwater West is bordered by exposed intertidal rocky shore with areas of shingle and mud. The rocky shore extends around the Angle Peninsula to the north and supports	Scoped in for detailed assessment.

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
		furoid and red seaweeds and communities of intertidal species such as mussels, barnacles and lichens. The subtidal area is dominated by sandy habitats, with small areas of coarse sediments and, in nearshore waters particularly, bedrock habitats. Nearshore seabed habitats to the north and south of Freshwater West consist of rocky substrate in high energy environments. Potential impacts to benthic flora and invertebrate fauna could arise as a result of direct physical disturbance, smothering or abrasion, changes to suspended sediment concentrations, changes to water quality and physical and sediment processes, thermal impacts, EMF impacts and introduction of INNS.	
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:			
0.5km² or larger	Direct	The proposed Project boundary does not lie within the Milford Haven Outer but the northern extent of the ZOI does overlap with the water body, and the footprint of the activity surpasses 0.5 km ² .	Applicant has taken to detailed assessment
1% or more of the water body's area		The proposed Project boundary does not lie within the Milford Haven Outer waterbody. However, the ZOI does overlap sufficiently for this to be scoped in for further assessment.	Applicant has taken to detailed assessment

Scoping table for Transitional and Coastal water bodies

Water body name: Milford Haven Outer Coastal

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)
Within 500m of any higher sensitivity habitat (see table below)		There are no higher sensitivity habitats within 500 m of the activity footprint. The closest higher sensitivity habitats to the Offshore Project Boundary are maerl beds and intertidal seagrass within Milford Haven Outer, located approximately 5 km from the offshore proposed Project boundary.	Impact assessment not required.
1% or more of any lower sensitivity habitat (see table below)		The portion of the proposed Project offshore boundary, covered by lower sensitivity habitats is lower than 1 %.	Impact assessment not required. Nonetheless, the applicant has scoped marine habitats in for detailed assessment.
Fish fauna (Transitional water bodies only): could the proposal lead to:			
changes to the composition, abundance and age structure of fish fauna	N/A		
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		
entrainment or impingement of fish	N/A		
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		

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 coastal waterbody GB611008590003	Direct	There is potential for the introduction and spread of INNS via biofouling of vessel hulls and ballast water, placement of hard structures i.e. cable and scour protection during construction, and during removal of proposed Project infrastructure (decommissioning).	Taken to detailed assessment.
Milford Haven Outer coastal waterbody GB641008220000	Direct		

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	The following are located within 2 km of the proposed activity: - Skomer, Skokholm and the Seas off Pembrokeshire SPA - Castlemartin Coast SPA - Pembrokeshire Marine SAC - West Wales Marine SAC The potential impacts on these European/Ramsar sites have been assessed as part of the Habitat Regulation Assessment (HRA) for the project which concluded that the project would not have an adverse effect on the integrity (AEOL) of a European/Ramsar site. The HRA included consideration of transboundary impacts on SACs within other jurisdictions, where MMUUs include SACs outside of UK waters.
Bathing Waters	Yes	The following bathing waters are located within 2 km of the proposed activity: - Freshwater West The following bathing waters have also been considered although are further than 2km from the proposed activity - Dale - West Angle - Marloes Sands - Sandy Haven - Broadhaven South

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?
		Barafundle Potential impacts include increase SSC, pollution incidents and possible breakout of bentonite as a result of HDD. The applicant will be required to submit a CEMP and Water Quality and Pollution Management Plan post consent which will be secured through licence conditions.
Shellfish Waters	Yes	Lower Cleddau This shellfish water is not within 2 km of the direct footprint of the proposed activity and has therefore been scoped out of further assessment.

Other Protected and Priority habitats and species.

- Nationally or locally protected areas e.g. SSSI, NNR etc

N/A

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	Yes	There are several Section 7 habitats and species (including benthic invertebrates, fish and macroalgal species) present in the study area. Benthic habitats and species have been scoped in for detailed assessment. No further assessment is required for fish as the water bodies potentially affected by the proposed Project are coastal waterbodies (not transitional).
Section 7 list of priority species e.g. water voles		

Ecosystem Resilience

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 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	The impacts on marine biodiversity are assessed in Chapter 19: Benthic ecology, Chapter 20: Fish and shellfish ecology, Chapter 22: Marine ornithology of Volume 3 of the ES.

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?	Yes
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?	Yes

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

It is important to consider the in combination and/or cumulative effects of pressures in a water body and the combined impacts of the proposed activity.

Do not include activities which have not yet been applied for, unless the activity is well defined and there are solid reasons for believing that it will be taken forward. Consult with [technical advisors](#) as required.

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

If required, further details can be provided in separate clearly referenced documents.

Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
Dredge disposal: - Milford Haven Two Disposal Site Offshore wind: - Erebus FLOW (array) - Erebus FLOW (export cable) - Trivane Demonstrator - The Crown Estate Round 5 FLOW - Llŷr 2 Floating Offshore Wind Project - Valorous (Blue Gem Wind) Marine energy: - Marine Energy Test Area (META) Phase 2 East Pickard Bay - META Phase 2 Dale Roads Cables and pipelines: - Greenlink Interconnector	Hydromorphology A full cumulative assessment for hydromorphology is detailed in Volume 3: Chapter 17 – Physical Environment of the ES. There is potential for cumulative effects with regards to increases in SSC and associated changes in bed level during construction. The likelihood of temporal overlap between activities is very low and any two sediment disturbance activities would generally be located several km apart. For the most part any cumulative increase in either the spatial footprint or peak concentration of sediment plumes are expected to be indistinguishable from background levels. Any associated changes in bed level can also be expected to be immeasurable. If the construction programmes for either Erebus and/or the proposed Project were to change, resulting in temporal overlap, whilst plume interaction may still occur, the potential for much higher concentration	In addition to the embedded mitigation measures outlined in the previous scoping tables, the below avoidance measures will be secured within the marine licence. A Cable Burial Risk Assessment (CBRA) will be produced post-consent which will detail the minimum burial depths of the offshore export cables throughout the offshore export cable routes, and indicative proposed locations where the target depth of burial may not be achievable and external protection is expected to be required. The CBRA will also detail which type of cable protection measure would be located at which locations and will seek to minimise the amount of sediment disturbance to as little as possible. Connecting the turbines to one another to string a single export cable back to shore (rather than a cable per turbine).	Yes

Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
- Dragon Energy Project Wave energy: - South Pembrokeshire Wave Demonstration Zone - Wave Dragon Project - Milla Fjord Site	and more persistent plumes than that previously described in the proposed Project-alone assessments of SSC is considered to be small. There is also potential for cumulative changes in waves, tides and sediment transport during operation, resulting in impacts to designated areas of seabed and or the coast. The potential for cumulative changes in waves, tides and associated patterns of sediment transport arising from the Array Area with any of the identified developments is extremely low. This is due to the highly localised nature of blockage related change arising from the proposed Project The potential for significant cumulative effects with other projects, plans and activities is considered unlikely to result in a deterioration in status of any WFD waterbody. A full cumulative assessment for benthic habitats including with regards to INNS is detailed in Volume 3: Chapter 19 – Benthic Ecology of the ES. There is a potential for the introduction and/ or spread of marine INNS as a result of activities associated with the	Adoption of a Construction Environmental Management Plan (CEMP) and good practice measures during construction - Prior to construction starting onsite, a CEMP will be prepared by the Contractor. The CEMP would outline the measures necessary to avoid, prevent and reduce adverse effects where possible upon the marine water environment. The Final CEMP will be supported by a Water Quality and Pollution Management Plan, detailing in further detail the measures required to protect the water environment. Water Quality and Pollution Management Plan - The measures in this plan will be put in place to prevent pollution to the water environment. Despite some of these measures being aimed at terrestrial water bodies, due to connectivity to the marine environment these measures are also deemed relevant to preventing adverse effects on marine water quality. Biosecurity measures will be secured through the requirement for a Biosecurity Management Plan (BPM), as a condition of the marine licence. The BMP will include measures such as: All project vessels shall adhere to the International Maritime	Yes

Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
	proposed Project. This includes the placement of materials and structures on the seabed, providing new habitat for marine INNS to colonise, and the movement of vessels transporting INNS via ballast water and attached to hulls/equipment.	Organisation (IMO) Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Biofouling Guidelines) (IMO, 2011). All project vessels shall adhere to the International Convention for the Control and Management of Ships' Ballast Water and Sediments (IMO, 2017).	
	A full cumulative assessment for benthic habitats is detailed in Volume 3: Chapter 19 – Benthic Ecology of the ES. There is potential for cumulative effects to benthic habitats as a result of temporary physical disturbance and increased SSC; changes to water quality; direct habitat loss; habitat change; EMF and thermal emissions. However, the cumulative effects from the above pathways arising as a result of the proposed Project in combination with the other activities or projects listed, have been assessed as negligible to minor and not significant. The potential for significant cumulative effects from the proposed Project with other projects, plans and activities is	Identified embedded mitigation measures which will be included as project commitments and/or secured within the marine licence include: Micro-siting of the offshore export cable within an agreed cable corridor, combined with pre-installation ecological surveys to inform micro-siting of infrastructure to avoid sensitive habitats; use of non-toxic drilling fluids during HDD; deployment of appropriate protection measures for buried or seabed surface laid infrastructure to minimise significance of impacts; the use of dynamic positioning by project vessels (rather than anchored vessels); implementation of best practice and management measures such as 'OSPAR Commission Guidelines on	Yes

Are there any activities or projects which may act in combination and/or cumulative? <i>If none, put 'N/A'</i>	Nature of the in-combination/cumulative effect (if any)	Avoidance measures Are there any legally binding avoidance measures which could be included within the project at this point that will ensure the potential effects are avoided?	Can the risk of deterioration or prevention of achieving water body objectives from in combination/ cumulative effects be ruled out? 'YES' or 'NO' or 'DON'T KNOW'
	considered unlikely to result in a deterioration in status of biological quality elements.	Best Environmental Practice' or agreed management plans (including a Project Environment Management Plan (PEMP) and Construction Environmental Management Plan (CEMP)); agreement of biosecurity risk assessments; and adherence to industry standard best practice regarding ballast water management, emergency pollution plans, effluent discharges, and biofouling management by project vessels.	
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? (choose one of the following options and delete the other)	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. There is a risk the proposal may cause deterioration or prevent the water body from meeting its objectives and therefore a detailed compliance assessment might be required if no mitigation measures that can be included at Q2.5. If this section is selected, complete Q2.5.
Q2.5 Mitigation measures Are there any legally binding mitigation measures which could be included within the project at this point that will ensure the potential effects are avoided? Describe any conditions, restrictions or other measures, if any, applicable to the activity/project, 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. <i>If required, further details can be provided in separate clearly referenced documents.</i>	There is a risk the proposal may cause deterioration or prevent the water body from meeting its objectives however the following legally binding avoidance measures will be included within the project at this point that will ensure the potential effects are avoided. List the legally binding avoidance measures that will be included in the consent/permit/authorisation, and who will be responsible for applying them. If this section is selected, delete Stage 3. There is a risk the proposal may cause deterioration or prevent the water body from meeting its objectives and therefore a detailed compliance assessment is required. There are no mitigation measures that can be included at this stage. If this section is selected, complete 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 coastal waterbody GB11008590003	Hydromorphology (at high status): - Morphological conditions, for example depth variation, the seabed and intertidal zone structure; - tidal patterns, for example, dominant currents; - wave exposure.	A detailed impact assessment on hydromorphology is presented in Volume 3: Chapter 17 – Physical Environment of the ES. Morphology of the seabed at Freshwater West could theoretically be impacted by HDD excavation and drilling operations. The magnitude of impact is predicted to be (no greater than) low. Where direct disturbance takes place to the beach / shallow subtidal seabed (e.g., via trenching), the impact will only be present for the duration of the construction works and will therefore be temporary in nature. Sediment disturbance will occur during construction, operation, and decommissioning phases. Sediment resuspension is expected during installation surveys, route clearance activities, cable burial activities, anchor deployment, HDD activities,	When considering embedded mitigation and the mitigation outlined for each individual element assessed (Chapter 18: Marine Water and Sediment Quality and Table 10D-15 of the Offshore WFD Assessment), no significant effects were identified. Embedded mitigation includes: Appropriate excavation techniques to minimise adverse effects such as increased turbidity.	No	Yes

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'
		cable maintenance and cable removals and protection measures. Sediment plume extent will be largely restricted to the Zol and it is expected for the majority of any sediment plume to settle out within a number of seconds to minutes. No significant effects in hydromorphology were identified for any of the project phases. As such, any residual hydromorphological impact is not considered significant at the scale of the Pembrokeshire South WFD waterbody and would not lead to deterioration or prevention of future improvement.	Cable Burial Risk Assessment – to minimise sediment disturbance where possible. Disturbance from cable protection and scour protection installations – to be minimised through good engineering design practice. Drilling and piling – to follow good practice protocols. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Construction and Environmental Management Plan (CEMP) and a Water Quality and Pollution Management Plan. The plans referred to above will require submission and subsequent approval prior to commencement of the proposed activities. This will be secured through licence conditions.		
Pembrokeshire South coastal water body GB11008590003	Biology: Benthic habitats	A detailed impact assessment for benthic habitats is provided in Volume 6: Appendix 10D – Offshore Water Framework Directive Assessment and Volume 3:	Detailed mitigation for the construction and operational phases of the Project is provided in sections 10.11.36	No	Yes

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'
and Milford Haven Outer coastal waterbody GB641008220000	- Activity footprint 0.5km² or larger; - Activity footprint 1% or more of the water body's area	Chapter 19 - Benthic Ecology of the ES. This is summarised below. Potential impacts from INNS are considered separately for all phases. Potential construction and decommissioning phase impacts include: - Direct loss and physical disturbance to benthic habitats and species; - Temporary increase in SSC and sediment deposition leading to contaminant mobilization, turbidity and smothering effects; - Changes to marine water quality from the use of HDD drilling fluids; and - Changes to marine water quality from accidental leaks and spills from vessels, including loss of fuel oils. Potential operation phase impacts include: - Temporary increase in SSC and sediment deposition leading to contaminant mobilisation, turbidity and smothering effects; - Alteration and / or indirect loss of habitat during the operational lifetime, including from the introduction of hard substrate resulting in increased heterogeneity and new biological communities, on-going scour, changes in hydrodynamics, increased sedimentation and smothering, and abrasions from the movement of catenary chains; - Disturbance to benthic habitats during planned maintenance and instances of cable failure,	and 10.11.39 of the Offshore WFD Assessment, and summarised below: - Production of a Construction and Environmental Management Plan, and a Water Quality and Pollution Management Plan. The plans referred to above will require submission and subsequent approval prior to commencement of the proposed activities. This will be secured through licence conditions: - General Guidance and Best Practice Measures - Storage of Plant Materials - Environmental Inductions - Specialist training - Water Quality Monitoring Programme - Water Quality and Pollution Management Plan		

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'
		excavation and disturbance from movement of catenary chains; • Disturbance to benthic habitats and species due to subsea cable thermal emissions; and • Effects of Electromagnetic Field (EMF) emissions; Direct loss and physical disturbance (construction) In areas of predominantly sandy sediment and sandbanks, like the proposed Project, and particularly in shallow waters, there is regular natural disturbance of the seabed due to wave action and the tidal cycle. Therefore, communities inhabiting such environments are considered to be relatively tolerant of disturbance. As sediments are displaced and backfilled there will be some mortality of larger and less mobile species but for many animals, displacement will have only a temporary impact, and fauna will be able to redistribute within the sediment once the installation spread has moved away. Recovery of habitats is expected to be relatively rapid. Temporary increase in SSC and sediment deposition leading to contaminant mobilization, turbidity and smothering effects Construction Any measurable change in suspended sediment concentrations will be temporary and localised, with the majority of sediment consisting of sands and gravels. Gravels are expected to have deposited on the seabed between 0 m to 50 m and sands between 50 m to 500 m away of the source of disturbance. In terms of fines, 0 m to 50 m from any area of disturbance will be the	• Selection of an Array Area and OfECC route that avoid a number of constraints and seabed features, with further information to be acquired prior to finalisation of detailed design through additional Geophysical and geotechnical survey and UXO survey. • Scour protection measures – will take account of environmental setting; design will actively minimise potential for local sediment erosion, accretion and general interaction with ambient flows. • Minimising seabed disturbance and associated turbidity – measures and guidance will be incorporated into the cable layout design: ○ OSPAR Commission (2012) Guidelines on BEP in Cable Laying and Operation ○ Connecting the turbines to one another to string a single export cable back to shore (rather		

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'
		zone with the highest SSC increase (tens to hundreds of thousands of mg/l). 50 m to 500 m would see a zone of measurable SSC increase (hundreds to low thousands of mg/l). The increase in SSC between 0 to 500 m would last for the duration of active disturbance plus up to 30 minutes following end of disturbance. Fine sediment is unlikely to deposit in measurable thickness. Several methods are incorporated into the cable layout design to minimise turbidity during the installation phase of the proposed Project. Mobilisation of sediment-bound contaminants can also occur during periods of increased SSC. However, through rapid dilution and dispersion due to water movement through the Study Area, there are expected to be no resultant detectable increases in sediment bound contaminants during Installation activities. Therefore, the effect of increases in sediment-bound contaminants to benthic receptors are not considered to be significant, and with the proposed mitigation in place, it is not expected that there would be an impact to the water quality element. Operation Temporary increase in SSC could occur during cable repairs and / or the remedial reburial of exposed cables that may be required during the operational lifetime of the proposed Project. Due to the expected shorter period of time over which repairs would take place compared to the Installation activities, any local increases in SSC and therefore contaminants, turbidity and smothering will be no greater than that associated with Installation.	than a cable per turbine); ○ Minimising the cable route to shore as far as possible; ○ Selecting installation techniques which minimise seabed disturbance as far as possible; ○ Designing the OfECC route to avoid sensitive habitats (designated Annex 1 reef and Annex 1 sandbanks in particular) where practical and providing appropriate buffers to protect sensitive areas from accretion of suspended sediment. ● Ensuring optimal burial methods are selected for the cable installation activities. ● Cable Burial Risk Assessment will be undertaken. Activity-specific embedded mitigation and good practice measures are outlined in 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'
		Changes to marine water quality from the use of HDD drilling fluids During HDD, due to the small amounts of fluid, if any, likely to be released, it is only anticipated that a temporary local reduction in water quality at the HDD breakout may occur. Due to the dynamic nature of the intertidal environment, any fluid is expected to be rapidly diluted and dispersed within the marine environment. Therefore, only receptors in the immediate vicinity of the HDD breakouts are likely to be in contact with drilling fluids, which pose little risk to the environment. With the proposed mitigation in place, it is not expected that there would be an impact to the water quality element. Changes to marine water quality from accidental leaks and spills from vessels, including loss of fuel oils In terms of leaks and spills from vessels, with the mitigation measures in place, the risk of an accidental leak or spill is considered unlikely. However, should it occur, the leak or spill is expected to be minor, localised and temporary with only small amounts of pollutant released into the marine environment which will be subject to immediate dilution and dispersion over the tidal cycle. With the proposed mitigation in place, it is not expected that there would be an impact to the water quality element. Alteration and / or indirect loss of habitat during the operational lifetime, including from the introduction of hard substrate resulting in increased heterogeneity and new biological	10D-18 of the Offshore WFD Assessment, specifically with regards to: • Third party vessel communication and management. • Installation vessel requirements • Site and routing selection and design • Turbine Installation • Excavation techniques and turbidity • Drilling Fluid		

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'
		communities, on-going scour, changes in hydrodynamics, increased sedimentation and smothering, and abrasions from the movement of catenary chains (operation) The installation of cable protection berms left in place for the operational phase; and the placement of floating platforms and associated mooring / anchoring systems could result in the alteration and / or loss of habitat during its operational lifetime. In addition to changes in the biological community, the addition of anthropogenic structures on the seabed can lead to on-going scour throughout the duration of the operational phase. However, on-going scour is not expected to cause changes to the seabed. The seabed in the areas within which cable protection may be required are naturally highly mobile areas and therefore benthic receptors are considered to have some habituation to localised disturbance from scour and the associated movement of sediment or loss of habitat. Small areas of Annex I Reefs and biogenic reefs and fragile sponge and anthozoans may be temporarily lost due to scour. However, the highly mobile nature of the area suggests that any local disturbance or loss of habitat due to scour will be followed by recovery, with the seabed expected to continually return to baseline conditions when scouring occurs. Therefore, it is not expected that there would be an impact to the biology (habitat) quality element. Disturbance to benthic habitats during planned maintenance and instances of cable failure, excavation and disturbance from movement of catenary chains (operation)			

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'
		Maintenance works are likely to be highly localised to the area of concern and therefore the spatial extent of any impacts would be small in extent. Furthermore, any maintenance or repairs works would be of a significantly shorter duration. The only exception is where rock protection would be required (where previously rock was not placed) as part of maintenance and cable repair works to achieve cable protection when trenching is not possible. In the event of additional placement of external protection on the seabed, further permanent physical disturbance to and / or loss of benthic habitats would likely arise. The impact on benthic receptors from the movement of catenary chains during the operational lifetime of the proposed Project has been assessed as not significant. Movement of chains during planned maintenance is not expected to occur on a larger scale than during the normal operation of the proposed Project. Therefore, it is not expected that there would be an impact to the biology (habitat) quality element. Disturbance to benthic habitats and species due to subsea cable thermal emissions (operation) The predominantly sandy habitats present in the Array Area and Offshore Project Boundary support a wide variety of habitats and biotopes which could be directly affected by increased sediment temperature. However, whilst the sediment surrounding the cable may be heated there is negligible capability to heat the overlying water column because of the very high heat capacity of water, meaning there would be no effects on epibenthic communities, such as the Annex I reef habitats and other habitats present in the Study Area			

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'
		including fragile sponges and blue mussels, and these are therefore not considered further. In addition, the effect of thermal emissions from the proposed Project on subtidal and sublittoral sands and gravels is not expected to cause any impact to the biology (fish) quality element. Effects of Electromagnetic Field (EMF) emissions EMF will be emitted for the duration of operational life of the proposed Project, from both the export and the inter-array cables. Results from the project-specific EMF assessment (EMF Modelling Report) found that the effects of EMF reduce with distance from the cable, and the modelling shows negligible emissions beyond a distance of 2 m for this burial depth. Where burial is greater this distance will be further reduced. At crossings with other power cables, the potential increase in EMF is higher. However, the area where cables cross and interact is very small and as EMF reduces with distance any increase is also expected to be highly localised. For dynamic exposed cables in the water column, a distance of 0.44 m from the cable surface EMF is approximately equal to background levels. Given that emissions are considered to be negligible beyond 2 m from the cable route, and benthic invertebrate species are considered to have a low sensitivity to EMF, the effects are considered negligible and therefore not significant. Impacts of the decommissioning stage are not expected to exceed impacts of the installation or operational phase. Therefore, all impacts associated			

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'
		with decommissioning are considered to be in line with those of the construction phase.			
Pembrokeshire South coastal water body GB11008590003 and Milford Haven Outer coastal waterbody GB641008220000	Introduction and spread of INNS	INNS could be introduced and spread during all phases of the project via vessel hulls and ballast water. No INNS were identified in the Study Area during the benthic characterisation study. However, benthic surveys conducted for Project Erebus identified several INNS towards the mouth of Milford Haven (Marine Space Ltd, 2019a). It is not anticipated that any hard substrate will be placed around the mouth of Milford Haven for the proposed Project due to the route that the cable will follow. With mitigation and best practice measures in place, it is not expected that there would be an impact to the biology (fish) quality element.	To minimise the likelihood of introduction of INNS the following embedded measures are proposed: - All project vessels shall adhere to the International Convention for the Control and Management of Ships' Ballast Water and Sediments with the aim of preventing the spread of marine INNS (IMO, 2017); and - All project vessels shall adhere to the IMO Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Biofouling Guidelines) (IMO, 2011).	No	Yes

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

Conclusion of WFD Compliance Assessment & Authorisation

WFD stage 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.	
WFD stage 2 scoping has been completed and the activity/project is considered as having no risk of causing deterioration or preventing any water body or WFD Protected Area from reaching its objectives and taking account of the advice from technical officers—is considered compliant with the Water Framework Directive/Regulations.	
In light of the conclusions of a detailed compliance assessment (Stage 3), and taking account of the advice received from technical specialist advisors, it has been established that the activity/project has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives, taking into account any conditions or restrictions as applicable, either alone or in-combination with other activities.	
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	Joe Thomas
Job title	Lead Specialist Licensing Officer

Date	18 March 2026
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Consultation with technical advisors/specialists

Relevant section of the WFD compliance assessment	Date(s) of correspondence* and any meeting(s) with technical advisor(s) and include the name of the technical advisor	Description of how the comments from technical advisors have been considered
Stage 3	NRW A July 29 2025	Following advice from NRW, Broadhaven south and Barafundle have been included in stage 2 of the assessment.
Stage 3	NRW A July 29 2025	NRW A recommend that an assessment of bentonite pollution is assessed for the Pembrokeshire South waterbody (as well as Milford Haven Outer). This has been considered and identified as a potential impact to bathing waters, The applicant will be required to submit a CEMP and Water Quality and Pollution Management Plan post consent which will be secured through licence conditions.
Stage 3	NRW A July 29 2025	NRW A requested that specific reference is made to the mitigation to be detailed within the Water Quality and Pollution Management Plan to be able to conclude no deterioration to the waterbody, however if this wasn't available then it would need to be approved post consent in consultation with NRW A. This has now been included in stage 3 with specific reference to the CEMP and Water Quality and Pollution Management Plan will requiring submission and subsequent approval prior to the commencement of any proposed activities.