

WFD Compliance Assessment

OGN 72 Appendix 2 WFD Compliance Assessment template

- In completing this template for a WFD compliance assessment, refer to OGN72 ([link](#)) for definitions, processes and further links to useful websites.

If there are any problems or issues with the information in this desk instruction, you must report it to the responsible Manager Team member named as the owner and guidance.development@cyfoethnaturiolcymru.gov.uk

Version History

Document Version	Date Published	Summary of Changes	Authorised by
1	September 2020	Document created and ready for trialling	
Review Date: [Month & Year]			

Figure 1: Stage 1 Screening

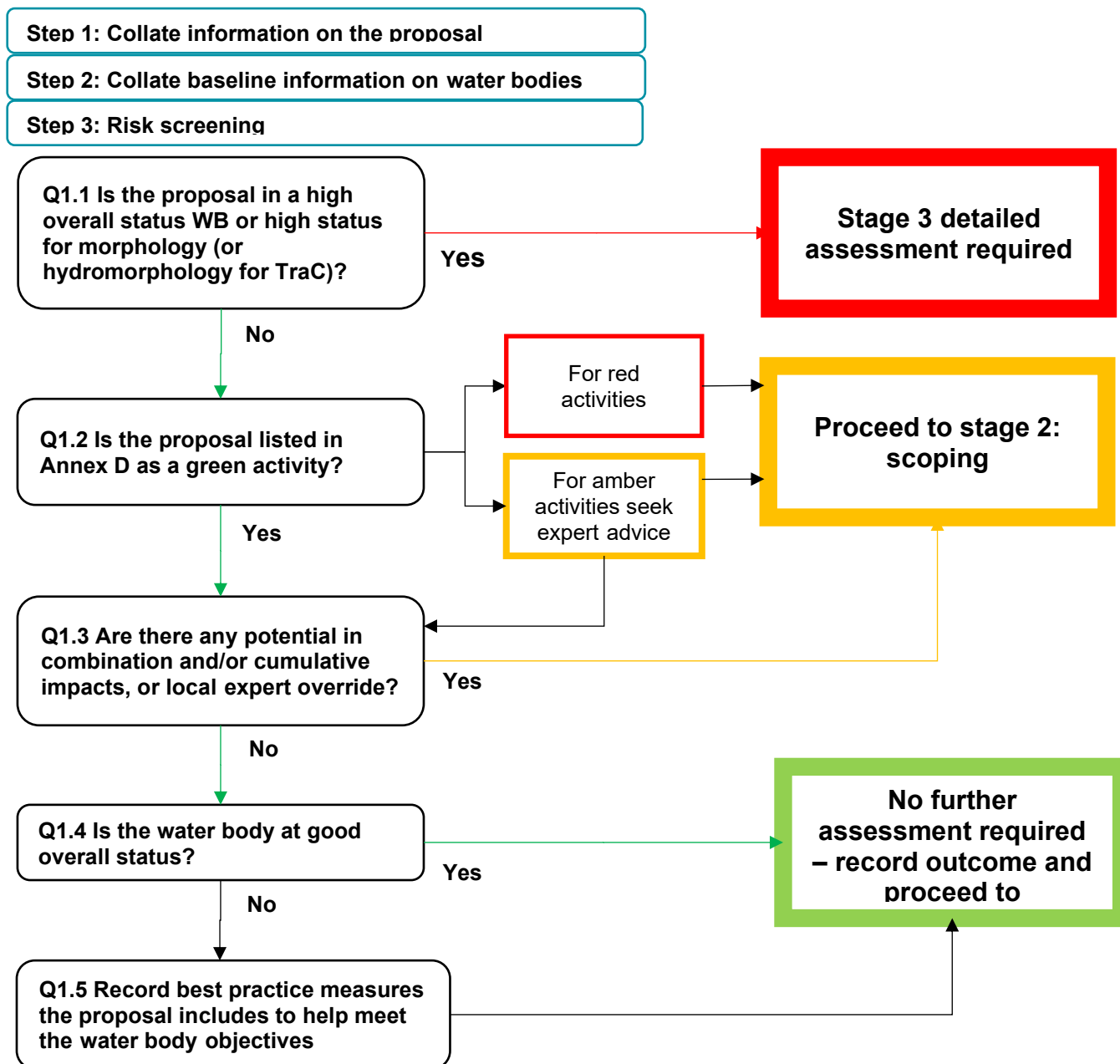
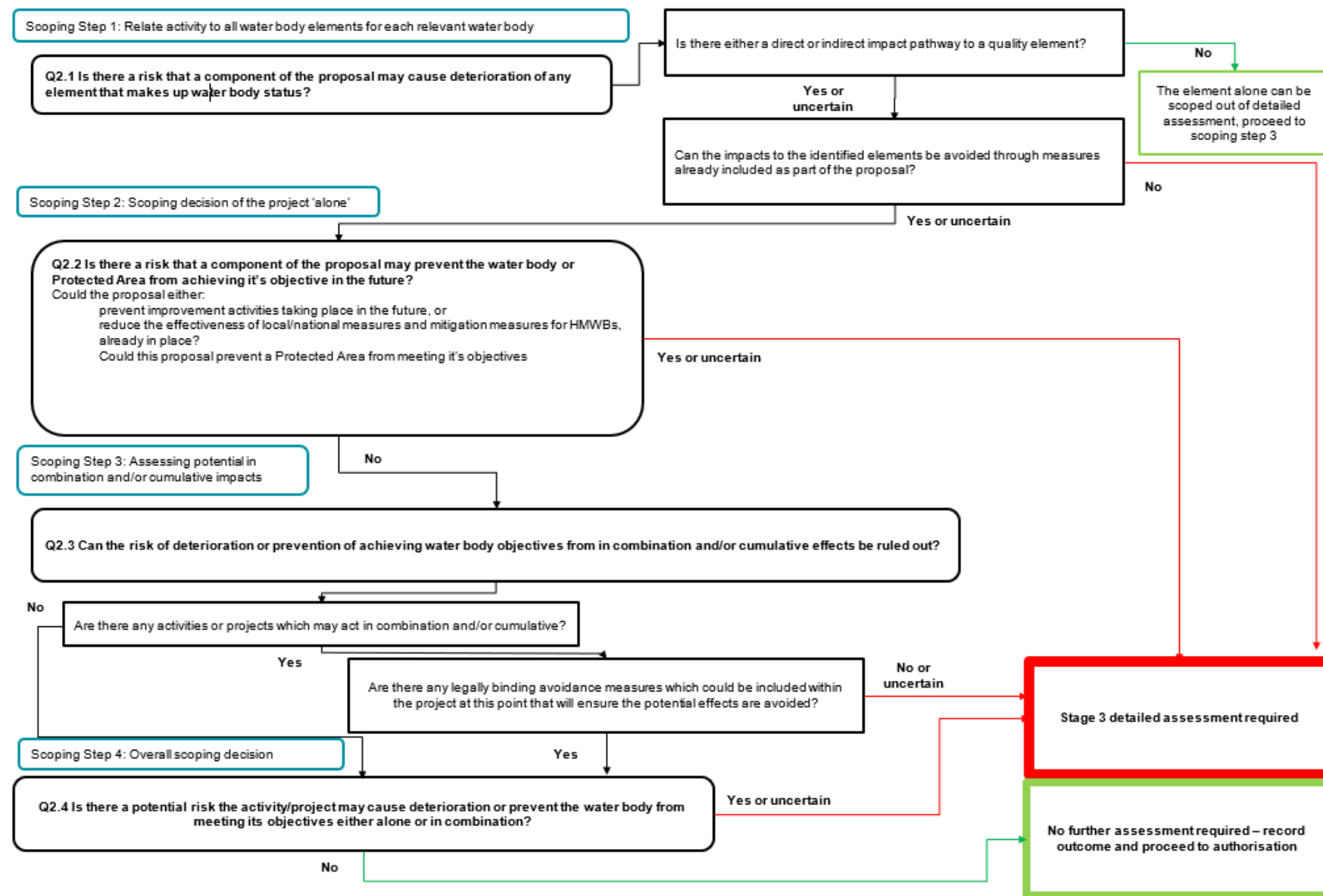


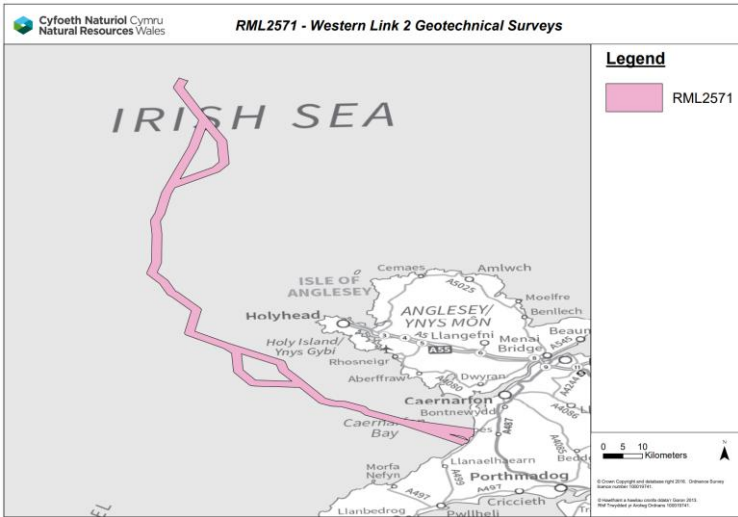
Figure 2: Stage 2 Scoping



WFD Compliance Assessment of Western Link 2 Geotechnical Surveys

Stage 1 step 1: proposal details.

a): Project details where an <u>external party</u> has applied to NRW for any form of authorisation		
Project details	Application reference number (if applicable)	RML2571v2
	Date application received	08 December 2025 (original application) 31 July 2026 (second variation application)
	Applicant details	National Grid Electricity Transmission PLC
	Activity proposed	To inform the development of the Western Link 2 project, geotechnical surveys are required to gather baseline data on potential route options. The survey activity will comprise the following: - sediment grab sampling (0.01 m² primary dual Van Veen grab, or secondary Hamon/Day grab): - Cone Penetration Testing (CPT, offshore, >10 m water depth) or T-bar - CPT (nearshore, <10 m water depth) - vibrocore samples (offshore, >10 m water depth) - vibrocore samples (nearshore, <10 m water depth) - borehole samples (nearshore, <10 m water depth) Drop down video transects (Remotely Operated Vehicle (ROV)) will also take place in 10 km intervals with a minimum length of 200 m, increasing to 500 m in sensitive areas. Geophysical surveys are also proposed to take place as part of the wider survey campaign of the project. A separate European Protected Species (EPS) risk assessment and licence has been prepared for the geophysical survey Deposits as per the agreed 'emergency procedures' in the event of hitting an aquifer under pressure. The Licence Holder has provided a clear summary of the proposed changes to the activity within supporting document <i>RML2571v2 - RML2571v1 Application Form Amendments</i>. The Licence Holder has requested additional samples to be collected within the already licenced area as per the below: • 9 jack-up barge deployments (nearshore, <10 m water depth) • 9 boreholes (nearshore, <10 m water depth)

	• 9 cone penetration tests (nearshore, <10 m water depth) • 16 vibrocores (nearshore, <10 m water depth) • 18 grabs across the licenced survey corridor This would increase the total number of each sample type across the same licensed area (250.17 km²) as listed below: • 18 jack-up barge deployments (nearshore, <10 m water depth) • 18 boreholes (nearshore, <10 m water depth) • 18 cone penetration tests (nearshore, <10 m water depth) • 18 vibrocores (nearshore, <10 m water depth) • 348 grabs across the licenced survey corridor
Relevant legislation	Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
List other permissions that may be required where known	N/A
Location (include map where appropriate)	Irish Sea : 
Application documents <i>Include: Project purpose and background, site map, scaled plan, site photographs</i>	RML2571 - WL2 Application RML2571 - WL2 Survey Corridor Coordinates Wales RML2571 - WNMP RML2571 - WL2 Survey Corridor Wales Shapefile RML2571 - WL2 INNS Biosecurity RA and Management Plan RML2571 - NRW Geotechnical Survey Technical Note_rev01

<i>and working method statement.</i>	RML2571 - Marine Jurisdictions and the WL2 2026 Survey Licence Corridor RML2571 - Application Form Amendments RML2571 - NRW Geotechnical Survey Technical Note_rev02 RML2571v1 - Application Form RML2571v1 - 81535 NRW Geotechnical Survey Technical Note_May_Submission RML2571v1 - Complex variation request - Duly Making Checks LH Response RML2571v2 - Application Form RML2571v2 - Application Form Amendments RML2571v2 - 81535 NRW Geotechnical Survey Technical Note_LF2 Licence Amendment
Environmental Statement	N/A
List ongoing maintenance requirements. All structures will require maintenance	N/A
Timing of works	The survey is expected to take place between 1 March 2026 to 31 March 2027 over an anticipated duration of 3 months.
Pre-application correspondence	N/A
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, a WFD is therefore required
NRW team responsible for drafting this WFD Compliance Assessment report, and name of lead officer	Vicky Fisk, Marine Licensing Officer

	Date of assessment	07 August 2026
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Refer to [Annex A for internal works](#) and [Annex B for Permitting](#), these include flow charts to help you work through the process.

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

Date of classification information: Coastal Cycle 3 2024 Interim

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
GB651010610000	Caernarfon Bay South	Coastal	Western Wales	No	Good	Good	High	High	Proposed works are within the water body.

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

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

Stage 1, Step 3: Risk Screening

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.1	Is the proposal in a water body at high status or high status for morphology or hydromorphology?	N/A	YES - Caernarfon Bay South COMPLETE DETAILED ASSESSMENT FOR WATER BODY
Q1.2	Is the activity listed in Annex D as a green activity? Complete new row for each activity		

Question number	Risk screening questions	Name of activity	Screening decision – delete as appropriate
Q1.3	Are there any potential cumulative/in combination impacts? Or is there Local Expert Override*?		
Q1.4	Are the water bodies at Good overall status?		
Q1.5	Record best practice measures that the works include to help achieve the objectives of the water body.		

**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: Caernarfon Bay South (GB651010610000)

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

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

Scoping table for Transitional and Coastal water bodies

Water body name: Caernarfon Bay South

Water body ID: GB651010610000

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 - tidal patterns, for example, dominant currents - freshwater flow - wave exposure	N/A – other	A minority of survey locations fall within the waterbody. Due to the small scale and temporary nature of the geotechnical surveys, negligible changes in hydromorphology are anticipated.	N/A
Is the proposal in a HMWB?	NO		
Water quality An activity can modify the flow of water, introduce artificial materials or remove sediment and/or vegetation. These can all affect the water quality – particularly physico-chemical aspects of water quality - such as levels of dissolved oxygen, nutrients and ammonia. Include water quality in the detailed assessment if the activity could affect:			
water clarity (turbidity or suspended particulate matter concentration)	N/A – other	A minority of survey locations fall within the waterbody. Due to the small scale and	N/A

Scoping table for Transitional and Coastal water bodies

Water body name: Caernarfon Bay South

Water body ID: GB651010610000

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)
• thermal conditions (including shading) • oxygen levels – dissolved oxygen conditions • nutrients - dissolved inorganic nitrogen • microbial patterns • salinity/conductivity • is in a water body with a phytoplankton or opportunistic macroalgae status of moderate, poor or bad • 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). • chemicals are on the Environmental Quality Standards Directive (EQSD) list • activity disturbs sediment with contaminants (for estuarine and coastal above Cefas Action Level 1). • or, if the activity releases chemicals on the EQSD list and has a mixing zone, like a discharge pipeline or outfall, follow the Environment Agency's surface water pollution risk		temporary nature of the geotechnical surveys, negligible changes to water quality are anticipated.	

Scoping table for Transitional and Coastal water bodies

Water body name: Caernarfon Bay South

Water body ID: GB651010610000

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)
assessment guidance. This is part of the Environmental Permitting Regulations guidance.			
changes to the composition and abundance of aquatic flora	N/A – other		There will be localised impacts on soft sediments. Due to the relatively small scale nature of the works these impacts will be temporary.
changes to the composition and abundance of benthic invertebrate fauna	N/A – other		There will be localised impacts on soft sediments. Due to the relatively small scale nature of the works these impacts will be temporary.
0.5km² or larger	N/A – no impact pathway	N/A	N/A
1% or more of the water body's area	N/A – no impact pathway	N/A	N/A
Within 500m of any higher sensitivity habitat (see table below)	N/A – no impact pathway	N/A	N/A
1% or more of any lower sensitivity habitat (see table below)	N/A – no impact pathway	N/A	N/A
changes to the composition, abundance and age structure of fish fauna	N/A – no impact pathway	N/A	N/A
an impact on normal fish behaviour like movement, migration or spawning (for example creating a physical barrier,	N/A – no impact pathway	N/A	N/A

Scoping table for Transitional and Coastal water bodies

Water body name: Caernarfon Bay South

Water body ID: GB651010610000

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)
noise, chemical change or a change in depth or flow)			
• entrainment or impingement of fish	N/A – no impact pathway	N/A	N/A
• refuge/predation areas	N/A – no impact pathway	N/A	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 – no impact pathway	N/A	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.

WFD Protected Areas

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

Protected Areas and Critical sensitive habitats/species		
Consider if WFD protected areas are at risk from your activity. These include:	Applicable	How have you considered the potential impacts?
Protected Areas:		
• SACs/SPAs/RAMSAR	Yes	Potential impacts considered within HRA. No AEOL.
• Bathing Waters	No	There is unlikely to be a risk to bathers from the proposed activity.
• Shellfish Waters	No	There is unlikely to be a risk to shellfish waters from the proposed activity.
Other Protected and Priority habitats and species.		
• Nationally or locally protected areas e.g. SSSI, NNR etc	No	N/A
Section 6 Biodiversity and resilience of ecosystems duty (Environment (Wales) Act 2016) here - other Protected and Priority habitats and species. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. Identify if there is a risk that the activity/project could impact on a water dependant priority habitat and or species which are either critical to the ecological health of the water body or sensitive to changes proposed on the water body.		
• Section 7 list of priority habitats e.g. wetlands	No	N/A
• Section 7 list of priority species e.g. water voles	No	N/A
Ecosystem Resilience The Environment (Wales) Act 2016, Section 3 states that the objective of the sustainable management of natural resources is to maintain and enhance the resilience of ecosystems and the benefits they provide now and for future generations		
Consideration of ecosystem resilience – diversity, extent, condition, connectivity.	No	N/A

Stage 2, step 2: Scoping decision of the project ‘alone’

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

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

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

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

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

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

Are there any activities or projects which may act in combination and/or cumulative? <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'
N/A			

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'
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? <i>(choose one of the following options and delete the other)</i>	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. The proposal in a water body at high status or high status for morphology or hydromorphology. Therefore, a detailed assessment has to be completed. 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. The proposal in a water body at high status or high status for morphology or hydromorphology. Therefore, a detailed assessment has to be completed. 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 do 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'
Caernarfon Bay South GB651010610000	N/A	Some of the sampling occurs in a water body that has a high status for hydro morphology and therefore the requirement is to carry out a detailed assessment for the Caernarfon Bay South water body. The sampling survey is temporary. Individual surveys with a value <£1m would qualify as a Band 1 activity, which would screen out the requirement for a WFD assessment as part of the marine licence. Any impacts to the waterbody, if any at all, will be minor and only affect the immediate vicinity at the time of sampling. Therefore, the conclusion of the detailed compliance assessment for these proposed surveys is that the project has no potential to cause deterioration of any	N/A	NO	YES

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

Conclusion of WFD Compliance Assessment & Authorisation

In light of the conclusions of a detailed compliance assessment (Stage 3), and taking account of the advice received from technical specialist advisors, it has been established that the activity/project has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives, taking into account any conditions or restrictions as applicable, either alone or in-combination with other activities.	
Completed by	Vicky Fisk
Job title	Marine Licencing Officer
Date	07 August 2026

Consultation with technical advisors/specialists

Relevant section of the WFD compliance assessment	Date(s) of correspondence* and any meeting(s) with technical advisor(s) and include the name of the technical advisor	Description of how the comments from technical advisors have been considered
N/A	24 August 2026	No concerns raised by NRW (A).

*Attach a copy of any written correspondence with the WFD assessment for the audit trail

Where there is a dispute on the conclusion the decision should be taken by the Leadership Team member of the team exercising the competent authority role