



2026

Western Cleddau (0839)

Water Framework Directive (WFD)





DOCUMENT INFORMATION			
Project	Western Cleddau (0839)		
Location	Address: Freemens Way, Withybush, Haverfordwest, Pembrokeshire, SA61 1TR Grid Ref: SM 95778 15254		
Title	Water Framework Directive Assessment		
Document Ref	EV002765/0839/WFD-1	Issue / Revision	1.0
File reference	EV002765/0839/7/WFD-1		
Start Date	09/09/2025		
	Name	Signature	Date
Assessment Undertaken by	Owain Waters		04/2026
Document prepared by	Owain Waters		05/2026
Checked by	Julian Gregory		05/2026
Authorised by	Julian Gregory		05/2026

DOCUMENT CONTROL		
Rev.	Date	Description
0.0	04/26	Draft
1.0	05/26	Issued

Disclaimer

No part of this document may be copied or reproduced by any means without prior written permission from EcoVigour. If you have received this report in error, please destroy all copies in your possession or control.

This document has been prepared for the exclusive use of the commissioning party/parties and unless otherwise agreed in writing by EcoVigour, no other party may use, make use of, or rely on the contents of the report.

No liability is accepted by EcoVigour for any use of this document, other than for the purposes for which it was originally prepared and provided.

Opinions and information provided in the document are on the basis of EcoVigour using due skill, care and diligence in the preparation of the same and no explicit warranty is provided as to their accuracy.

Third party biological records are for project team use only and are not to be released to the public domain.



CONTENTS

1.	Introduction	4
1.2	Project Context	5
1.3	Methodology	6
2.	Introduction to the water framework directive	8
2.1	The Water Framework Directive	8
2.2	Scope of this assessment	8
2.3	Determination of Good Status	9
3.	Assessment Methodology	10
3.1	Methodology	10
4.	Baseline conditions	11
4.1	WDF Status of Waterbodies	11
5.	Water Framework Directive assessment: scoping for activities in estuarine and coastal waters	13
5.1	Section 1: Hydromorphology	13
5.2	Section 2: Biology, Habitat & Fish	14
6.	Designated Sites within Proximity to Site	16
6.2	Western Cleddau River - Special Area of Conservation (SAC)	17
6.3	Western Cleddau - Site of Special Scientific Interest (SSSI)	19
6.4	Sir Benfro Forol / Pembrokeshire marine - special area of conservation (SAC)	20
6.5	Milford Haven Waterway - Site of Special Scientific Interest (SSSI)	20
6.6	Annex I Habitat within Project Area	21
6.7	Section 3: Water quality	23
6.8	Section 4: WFD protected areas	26
6.9	Section 5: Invasive non-native species (INNS)	27
6.10	Summary of WFD Pre-Assessment findings	28
7	Proposed Project Mitigation	30
7.1	Construction Phase Mitigation	30
8.	WFD Conclusion	34
9	Appendix A - Biosecurity Management Plan & Risk Assessment	35



FIGURES

Figure 1: Main works location (OS Map).	4
Figure 2: Drawing illustrating new rock armour extent (red) near northern rail crossing.	5
Figure 3: New rock armour extent along southern section.	5
Figure 6: Statutory Sites in relation to design.	16
Figure 7: Location of design in relation to wider SAC.	16
Figure 8: PLAS SAC Habitat Map.	17

TABLES

Table 1: Summary of the WFD status of the rivers / watercourses flowing into the Estuary and connected water bodies.	12
Table 2: Summary table to find out the hydromorphology status of the water body, if it is classed as heavily modified and for what use.	13
Table 3: Water body summary table and Magic maps, or other sources of information if available, to find the location and size of these habitats.	14
Table 4: Biology.	15
Table 1: Annex I & II features of the PLAS SAC.	16
Table 5: Potential fish species at risk from your activity, but only if your activity is in an estuary or could affect fish in or entering an estuary.	22
Table 6: Water body summary table to find information on phytoplankton status and harmful algae.	23
Table 7: Assessing whether water quality is at risk from your activity through the use, release or disturbance of chemicals.	25
Table 8: Assessing whether project falls within mixing zone.	26
Table 9: Location of protected areas in your water body (and adjacent water bodies) within 2km of your activity.	26
Table 10: Risk from INNS.	27
Table 11: Summary of Pre-Assessment Stage Findings.	28
Table 12: Water Framework Directive (WFD) Assessment for the Meirionnydd groundwater waterbody.	29
Table 13: Proposed Mitigation Matrix.	30



1. INTRODUCTION

- 1.1.1 EcoVigour was instructed by MGroup – Rail Division to undertake a Water Framework Directive Assessment (WFD) for the scheduled remedial works to the Western Cleddau Bascule Rail Bridge, within Milford Haven.
- 1.1.2 This assessment includes a summary of the current local conditions and, where appropriate, identifies mitigation measures for any likely significant effects (LSE) that may arise as part of the construction and operation of the Proposed Scheme. This WFD Assessment is required to demonstrate that the proposed works will not result in deterioration in the water body status and adjoining water bodies or prevent them from meeting their Water Framework Directive objectives.
- 1.1.3 The main watercourse of concern is the Afon Cleddau, which flows directly below the structure in question and eventually flows into Pembroke Bay.



1.2 PROJECT CONTEXT

- 1.2.1 The rail bridge is situated east of Freemans Way, A4076, spanning over the Afon Cleddau. Access to the structure was off a lane from New Road south of the Territorial Army centre 100m northwest of the rail bridge. A footpath runs along the bank of the Afon Cleddau Northwest into the town, with a small footpath bridge allow access to both shores and the potential watercourse access area (figure 1). The area is close to the centre of Haverford West, however a distinct opening into natural habitat occurs to the East of the structure.
- 1.2.2 The bridge structure is a three-span bascule rail bridge design. The original wooden frame structure has been upgraded with a steel supporting structure, with a wooden platform supporting the rail line. Stone brick abutments support the far side of the structure along each shore. The bridges ability to move appears to no longer be part of the design, with only the original pulleys of the lifting equipment and wooden frame remaining below the supporting structure.

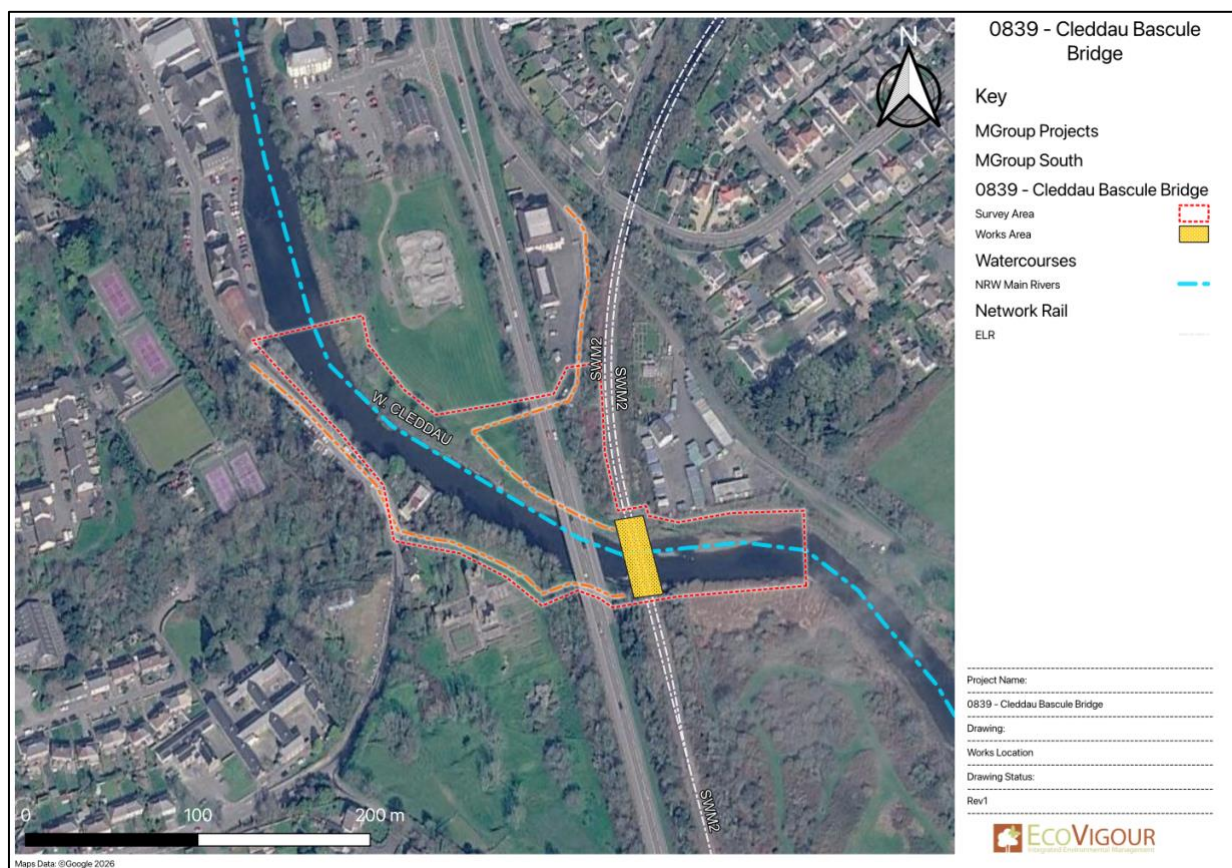


Figure 1: Map of Project Location.

- 1.2.3 The structure requires remedial works to timber and metallic elements. Network Rail & MGroup Ltd engineers therefore require access and a clear working area below the bridge deck, where a scaffolding can be erected to undertake the proposed maintenance activities. These works will include but are not limited to:
- ◆ Removal of vegetation cover.
 - ◆ Install of safe work barriers.
 - ◆ Formalised access and egress routes
 - ◆ Compound creation at hard standing to the northeast.
 - ◆ Delivery and erection of scaffolding equipment.
 - ◆ Localised metallic Repairs and remedial items outlined in the scope of works.



1.3 METHODOLOGY

Scope of Works

- 1.3.1 This method statement covers structural maintenance, and repair works to the Main Girder and movement monitoring of Span 2. Works comprise the cleaning of the web panel between the end plate and first intermediate stiffener, removal of silt and debris from the abutment shelves on both the internal and external faces of the girder, structural repair by over-plating in accordance with the detailed design.

Access Arrangements

- 1.3.2 Access to the structure will be provided by a purpose-designed scaffolding system erected beneath and alongside the structure, with access towers erected on either shore. Given that the structure spans over water, the scaffolding will be designed to an appropriate loading standard and will incorporate edge protection and debris netting to prevent tools, materials from entering the watercourse below. A working-over-water risk assessment and rescue plan will be in place prior to commencement. Within the central span, a mobile platform will be utilised which will be affixed to the lower deck of the structure. All main walk ways and mobile platforms will be situated above the highest flooding level indicated on the rail abutments.
- 1.3.3 Scaffolding material will be delivered to site via 4x4, utilising existing pathways. Where Japanese Knotweed is present, Terram will be placed down to prevent direct interaction with potential rhizomes with the base of the scaffolding. This will be mirrored in the biosecurity plan.

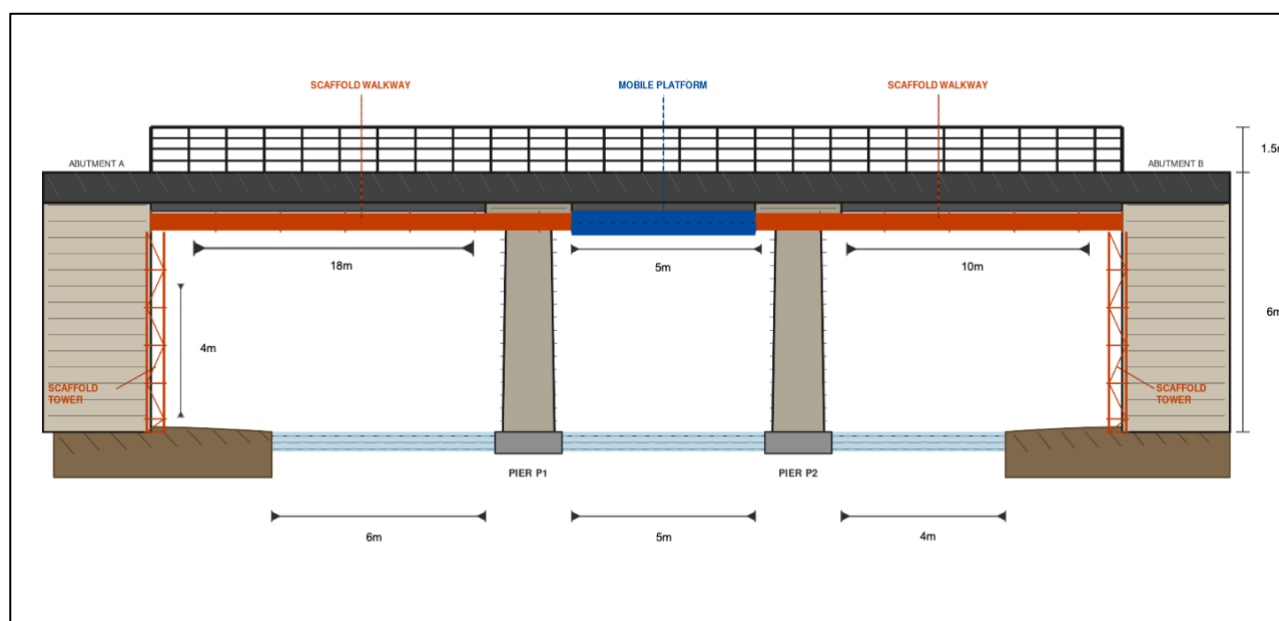


Figure 2: Indicative Dimensions.

Preparatory Works

- 1.3.4 Prior to commencement, the scaffold will be erected and inspected, environmental protection measures put in place, and all relevant permits to work obtained. A site induction will be delivered to all operatives.



Panel Cleaning

- 1.3.5 The web panel between the end plate and first intermediate stiffener will be cleaned down to remove all corrosion, loose material, and contamination. Cleaning method will be confirmed by the supervising engineer but is anticipated to comprise abrasive blasting or mechanical preparation to the specified surface preparation standard. All arising debris will be contained and disposed of in accordance with the site waste management plan.

Abutment Shelf Clearance

- 1.3.6 Silt and debris will be removed from the abutment shelves on both the internal and external faces of the girder. Material will be carefully removed by hand where required to avoid disturbing the bearing arrangement, collected, and removed from site.

Over-Plating Repair

- 1.3.7 Structural repair will be carried out by over-plating in accordance with the detailed design issued. Works will include surface preparation of the parent metal, fitting and alignment of the plate, and connection by the specified method (welding or bolting as detailed).

Health, Safety & Environmental Considerations

- 1.3.8 Key risks associated with these works include working at height, working over water, hot works (if welding is required), noise and vibration, and potential disturbance of silt in the watercourse. Controls will be defined in the full risk assessment and method statement. Environmental mitigation will include containment of debris and wash water, drip trays beneath any over-water works, and adherence to any Environmental Management Plan conditions. Works will be notified to the relevant environmental authority where required under applicable consents.

Working Hours

- 1.3.9 The physical works will take place between the hours of 08:00am – 16:30pm and will run for approx. 10 to 20 days.
- 1.3.10 Once completed, all temporary works elements will be demobilised and removed from the site, with the Marine License handed back to NRW.



2. INTRODUCTION TO THE WATER FRAMEWORK DIRECTIVE

2.1 THE WATER FRAMEWORK DIRECTIVE

- 2.1.1 The Water Framework Directive (WFD) (Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000) is a European Union Directive which committed member states to achieve good qualitative and quantitative status of all water bodies by 2015. Under the Directive water bodies are defined as all ground and surface waters, including rivers, lakes, transitional waters and coastal waters (up to one nautical mile from shore).
- 2.1.2 It was not possible to achieve good status of all water bodies by 2015; therefore, outstanding water bodies have objectives set for 2021 or 2027. Interim assessments were undertaken in 2024.
- 2.1.3 The WFD is transposed into law in England and Wales by The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (the 2017 Regulations). These revoke and replace The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 (subject to transitional provisions in article 38 of the 2017 Regulations).

2.2 SCOPE OF THIS ASSESSMENT

- 2.2.1 All new activities in the water environment need to take account of the requirements of the WFD. For a project or activity to be compliant with the WFD, it should demonstrate that:
- ◆ There is no risk of it causing a deterioration of the status of any element, in addition, for groundwater, it will limit or prevent the input of pollutants;
 - ◆ There is no risk of it preventing WFD protected areas from achieving their objectives;
 - ◆ It will not jeopardise any waterbody from achieving good status/potential; and
 - ◆ It will contribute to the protection, enhancement and restoration of waterbodies.
- 2.2.2 This WFD Assessment considers all activities that will take place as part of the proposed scheme, during both construction and operation, and identifies the potential risks associated with these activities and the WFD receptors that are at risk.
- 2.2.3 The NRW guidance includes detailed screening criteria that can be used to determine whether a proposed activity is not likely to cause a deterioration in the status of a waterbody. This includes a list of activities that in general will not cause a deterioration, such as 'temporary' works that do not normally last more than six months and are not likely to have a residual impact on a waterbody. The guidance also lists other physical works and defines screening thresholds for each; these thresholds help to determine whether any activity presents a risk to a waterbody and any requirements for further assessment. However, these thresholds are for guidance only and expert judgement is required to determine if a proposed activity may have an impact on a waterbody.
- 2.2.4 Published guidance also states that the assessment must consider the potential for impacts on the following:
- ◆ Protected Areas – these are defined under Article 6 of the Directive.
 - ◆ Priority Habitats – these are 'habitats of principal importance for conservation and biodiversity', which are defined under Section 41 of a Natural Environment and Rural Communities (NERC) Act 2006 in England and Section 7 of the Environment (Wales) Act 2016 in Wales.
 - ◆ Invasive non-native species (INNS) – assessment of INNS is required if a development could cause the introduction or spread of INNS to a waterbody.



- 2.2.5 A detailed Compliance Assessment would be required if it cannot be concluded that the scheme would not cause deterioration or inhibit the objective status of a waterbody. Further to this and in line with WFD requirements, there would be a need to apply the Article 4.7 test to seek approval for progression of the scheme if after the full WFD

2.3 DETERMINATION OF GOOD STATUS

- 2.3.1 Good status is determined from the ecological and chemical status of surface waters. These statuses are assessed according to the following criteria:
- ◆ Biological quality (fish, benthic invertebrates, aquatic flora);
 - ◆ Hydromorphological quality (e.g. riverbank structure, river continuity and substrate of the riverbed); and
 - ◆ Physical-chemical quality (e.g. temperature, oxygenation and nutrient conditions).
- 2.3.2 The chemical quality refers to environmental quality standards for river basin specific pollutants. These standards specify maximum concentrations for specific water pollutants. The WFD works on a 'one out, all out' basis, so if one such concentration is exceeded, then the water body will not be classed as having a good status. The chemical status of surface waters is therefore classified as good or fail.
- 2.3.3 The ecological status of surface waters is classified as being high, good, moderate, poor or bad, whilst water bodies that have been modified (e.g. canals or contain significant flood defences) are classed as 'Heavily Modified Water bodies' (HMWB) and have to reach at least good potential by their objective year.



3. ASSESSMENT METHODOLOGY

3.1 METHODOLOGY

3.1.1 This WFD Assessment was completed using the following methodology:

- ◆ The collection of baseline data to identify the current status, as well as future baseline and ability of the water bodies within and in close proximity to the proposed works to meet the WFD objectives;
- ◆ A Consultation with relevant authorities;
- ◆ The review of the proposed works and the potential impacts to the identified surface and groundwater bodies; this involves identifying the impacts that could reduce the WFD status and affect the ability of the water bodies to meet the objectives of the WFD;
- ◆ The consideration of mitigation that can be included in the design, and
- ◆ The provision of an assessment of residual risks.

3.1.2 This assessment has been prepared using the following WFD screening/scoping assessment guidance:

- ◆ Guidance for assessing activities and projects for compliance with the Water Framework Directive, OGN72, Version 1.1, May 2017, Natural Resources Wales.
- ◆ Advice Note 18: The Water Framework Directive, Version 1, June 2017, The Planning Inspectorate. Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2017/06/advice_note_18.pdf
- ◆ Local Authority services and the water environment: Advice note on the Water Framework Directive, Natural Resources Wales. Available at: <https://naturalresources.wales/media/2627/wfd-docs-eng.pdf>
- ◆ Water Framework Directive assessment: estuarine and coastal waters – How to assess the impact of your activity in estuarine (transitional) and coastal waters for the Water Framework Directive (WFD), 9 November 2017, Environment Agency.
- ◆ Available at: <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>.



4. BASELINE CONDITIONS

4.1 WDF STATUS OF WATERBODIES

- 4.1.1 Data on the location and status of WFD waterbodies and WFD Protected Areas has been obtained from the Water Watch Wales website (Waterwatchwales.naturalresourceswales.gov.uk) and the Multi-Agency Geographic Information for the Countryside (MAGIC) website (magic.defra.gov.uk/MagicMap.aspx).
- 4.1.2 The following WFD surface waterbody in proximity of the proposed scheme is Milford Haven Inner (GB531006114100).
- 4.1.3 Table 3 (below) presents summary information on the current WFD status of each of the constituent quality elements of the waterbodies downstream of the works. This information has been obtained from the Water Watch Wales website. Each of the quality elements will be assessed to determine whether the proposed scheme has the potential to adversely affect their status.



Table 1: Summary of the WFD status of the rivers / watercourses flowing below the structure.

Waterbody name, ID, Type, Management Catchment, River Basin District.	Hydro-morphological designation	Current overall status & objectives	Biological elements	Physico-chemical elements	Water body Protected Area Links
Milford Haven Inner (GB531006114100) Type: Transitional Man Catchment: Western Wales TraC RBD: Western Wales Area Name: Marine;North West Wales	Not Assessed Morphology = High	Current overall status = Moderate; Current ecological status = Moderate; Current chemical status = Fail;	Fish = Good Macroalgae = Moderate Phytoplankton = High Opportunistic Macroalgae = Moderate Invertebrates = Good Infaunal Quality Index = Good	Dissolved oxygen = High Dissolved Inorganic Nitrogen = Moderate Annex 8 Chemicals = High Copper = High Zinc = High Cadmium = High Brominated diphenylether (BDPE) Calc = Moderate Benzopyrene = High Hexachlorobutadiene = High Hexachlorobenzene = High Mercury = Moderate Fluoranthene = High Lead = High Nickel = High	Protected Area = Yes Bathing Waters = No Special Protection Area = No Drinking Water Protected Area = No Special Area of Conservation = Yes Nitrate Vulnerable Zone = No Shellfish Water = No



5. WATER FRAMEWORK DIRECTIVE ASSESSMENT: SCOPING FOR ACTIVITIES IN ESTUARINE AND COASTAL WATERS

Consider the potential risks of your activity to each of these receptors: hydromorphology, biology (habitats and fish), water quality and protected areas. Also consider invasive non-native species (INNS).

5.1 SECTION 1: HYDROMORPHOLOGY

5.1.1 The first stage is to consider if there is hydromorphology at risk from your activity.

Table 2: Summary table to find out the hydromorphology status of the water body, if it is classed as heavily modified and for what use.

Consider if your activity:	Hydromorphology risk issue(s)
Could impact on the hydromorphology (for example morphology or tidal patterns) of a water body at high status	There will be no changes to the below MHWS sections of the structures. During construction and temporary works at MHWS will be removed at the end of each shift. The works will therefore not impact the hydromorphology of the bay or the watercourse.
Could significantly impact the hydromorphology of any water body	Please see above - No impacts on any other water bodies.
Is in a water body that is heavily modified for the same use as your activity	The bay is considered to be heavily modified.



SECTION 2: BIOLOGY, HABITAT & FISH

5.2.1 The second stage is to consider if habitats, Biology and Fish Species are at risk from your activity. The figures and tables below illustrate and discuss the features present within the relevant units.

Table 3: Water body summary table and Magic maps, or other sources of information if available, to find the location and size of these habitats.

Area Name & ID		Milford Haven Inner (GB531006114100)	
Higher sensitivity habitats		Lower sensitivity habitats	
Habitat Type	Potential Impacts	Habitat Type	Potential Impacts
Saltmarsh	Potential for indirect impacts due to chemical and hydrocarbon emissions from the works, if sufficient controls are not put in place.	Intertidal Soft Sediment (Sand, Mud & Mixed A2.2, A2.3, A2.4)	Potential for indirect impacts due to chemical and hydrocarbon emissions from the works, if sufficient controls are not put in place.
Seagrass beds (LS.LMp.LSgr.Znol)	Potential for indirect impacts due to chemical and hydrocarbon emissions from the works, if sufficient controls are not put in place.		

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.



Table 4: Biology.

Consider if the footprint ⁴ of your activity is:	Biology habitats risk issue(s)
0.5km ² or larger	The total licensed area of the at and to access the structure is approximately 950m ² and hence the worksite will be below 0.5km ² (500000m ²).
1% or more of the water body's area	The transitional waterbody covers an area of approximately 21022792m ² . The footprint of the works is therefore less than 1% of the defined area.
Within 500m of any higher sensitivity habitat	Works will be undertaken within the following designated sites: ◆ Western Cleddau River - Special Area of Conservation (SAC). ◆ Western Cleddau River – Site of Special Scientific Interest (SSSI). ◆ Pembrokeshire Marine - Special Area of Conservation (SAC). ◆ Milford Haven Waterway – Site of Special Scientific Interest (SSSI). The impact of the works on the SSSI and SAC are considered in the sections below.
1% or more of any lower sensitivity habitat	

⁴ Note that a footprint may also be a temperature or sediment plume. For dredging activity, a footprint is 1.5 times the dredge area.



6. DESIGNATED SITES WITHIN PROXIMITY TO SITE

6.1.1 There is one statutory designated site interfacing or within proximity to the works site. Directly concerned with the proposed works are:

6.1.2 Site of Special Scientific Interest:

- ◆ Western Cleddau River (SSSI)

6.1.3 Special Area of Conservation:

- ◆ Western Cleddau River (SAC)

6.1.4 The Western Cleddau River is a designated Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). The site is designated primarily for important populations of a variety of protected and notable species. It is also noted for its range of river habitats, and a variety of associated riverside habitats.

6.1.5 Due to the works occurring within the Western Cleddau River (SAC/SSSI), an appropriate assessment shall be required; this will be further discussed throughout this document.

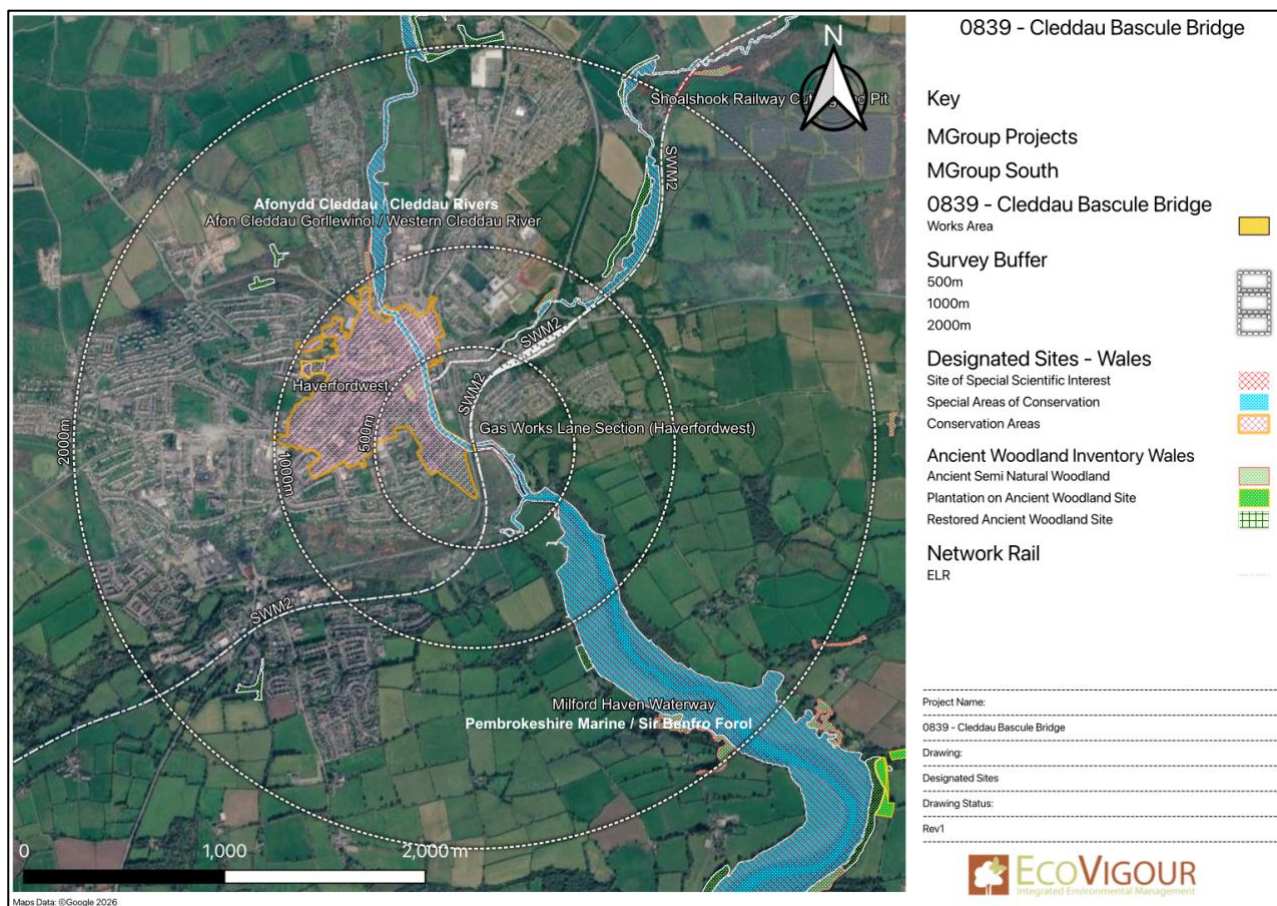


Figure 3: SAC & SSSI boundary in relation to works sites.



6.2 WESTERN CLEDDAU RIVER - SPECIAL AREA OF CONSERVATION (SAC)

SAC OVERVIEW

- 6.2.1 The main channel of the western Cleddau river extends for 30km between its source at Mathry to the tidal limit of the Daugleddau Estuary at Haverfordwest. The tributaries included within the Western Cleddau are the Afon Cleddau, Nant-y-bugail, Afon Anghof, Nant-y-coy Brook, Spittal Brook, Rudbaxton Water, Camrose Brook and Cartlett Brook. The river is designated primarily for important populations of otter (*Lutra lutra*), bullhead (*Cottus gobio*), river lamprey (*Lampetra fluviatilis*) brook lamprey (*Lampetra planeri*) and sea lamprey (*Petromyzon marinus*). It is also noted for its range of river habitats, including beds of submerged aquatic plants often dominated by water-crowfoot (*Ranunculus spp.*), as well as a variety of associated riverside habitats.
- 6.2.2 The Western Cleddau river is considered to be one of the best rivers in Britain for bullhead, brook lamprey and river lamprey, and supports a significant population of sea lamprey. Bullhead are found throughout the Western Cleddau. Although not of special interest regarding designation, the Western Cleddau is also a locally important migratory salmonid river, the principal species being sea trout (*Salmo trutta trutta*) with a small but well distributed population of salmon (*Salmo salar*). Non-migratory brown trout (*Salmo trutta fario*) are also common.
- 6.2.3 The Western Cleddau is one of the best rivers in Britain for otter, which are found on all the tributaries within the site. The river and associated habitat is also an important feeding corridor and resting site for an assemblage of bat species, and an aging population of the nationally scarce freshwater pearl mussel (*Margaritifera margaritifera*), which is recorded from only nine Welsh rivers.
- 6.2.4 Dense riverside vegetation, particularly woodland, scrub and tussocky vegetation is highly important to the otter, as these habitats provide safe, concealed breeding and resting sites.

SAC ANNEX FEATURES

- 6.2.5 Each SAC contains a mixture of Key features that inform the sites designation. Key Habitats (KH), Key Species (KS) or Sym (features that are of importance in a unit but are not the main focus of management or monitoring) features are identified. The table overleaf details the qualifying habitats and species of the SAC, which is considered to be one of the best areas in the UK for:

Table 5: Annex I & II Features present within the designated site.

Annex I habitats that are a primary reason for selection of this site	
N/A	None Listed.
Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site	
3260	Watercourses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation
7110	Active raised bogs (Priority Habitat)
91E0	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) (Priority Habitat)
Annex II species that are a primary reason for selection of this site	
1095	Sea lamprey <i>Petromyzon marinus</i>
1096	Brook lamprey <i>Lampetra planeri</i>
1099	River lamprey <i>Lampetra fluviatilis</i>
1163	Bullhead <i>Cottus gobio</i>
1355	Otter <i>Lutra lutra</i>
Annex II species present as a qualifying feature, but not a primary reason for site selection	
N/A	None Listed.



CORE MANAGEMENT PLAN UNITS

- 6.2.6 One of the roles of the Competent Authority charged with overseeing the development of a SAC is to produce and implement a Core Management Plan (CMP). CCW now NRW produced the initial CMP in 2012 and has been updated to Version 3 in 2022.
- 6.2.7 The works are situated within the SAC management unit 1009 (NRW Internal Ref: 1) (Western Cleddau SSSI), with the relevant Annex features that occur within the specific unit being outlined in the table below.

Table 6: Annex Features and Important Features within Management Unit.

Western Cleddau	
Management Unit	1009
SAC	YES
SSSI	YES
SAC Features	
Brook lamprey	KS
River lamprey	Sym
Sea lamprey	Sym
Bullhead	Sym
Otter	KS
Alluvial forests	Sym
Ranunculus habitat	KH
Table Key	
KH - a 'Key Habitat' in the management unit, i.e. the habitat that is the main driver of management and focus of monitoring effort, perhaps because of the dependence of a key species KS – a 'Key Species' in the management unit, often driving both the selection and management of a Key Habitat Sym - habitats, species and earth science features that are of importance in a unit but are not the main drivers of management or focus of monitoring. These features will benefit from management for the key feature(s) identified in the unit. These may be classed as 'Sym' (sympathetic) features because: (a) they are present in the unit but may be of less conservation importance than the key feature; and/or (b) they are present in the unit but in small areas/numbers, with the bulk of the feature in other units of the site; and/or (c) their requirements are broader than and compatible with the management needs of the key feature(s), e.g. a mobile species that uses large parts of the site and surrounding areas; and/or (d) key features (KH, KS) are closely associated with these features, and the conservation of key features depends on them being managed appropriately.	

CURRENT CONDITION OF KEY MEASURED UNITS

- 6.2.8 From the most recent updated assessment, the known status of the Key Features within the Core Management Plans, highlighted within unit 1009 are:
- ◆ Sea lamprey - Current Status: Unfavourable - Unclassified
 - ◆ Brook lamprey – Current Status: Unfavourable - Recovering
 - ◆ River lamprey - Current Status: Unfavourable – Recovering
 - ◆ Bullhead - Current Status: Unfavourable – Unclassified
 - ◆ European Otter - Current Status: Favourable – Maintained
 - ◆ *Ranunculus* habitat – Current Status: Unfavourable - Unclassified
 - ◆ Alluvial forests – Current Status: Unfavourable - Unclassified



- 6.2.9 Note, these statuses are based on the designated site as a whole and does not indicate whether specific areas are failing or succeeding in the necessary criteria.

6.3 WESTERN CLEDDAU - SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

OVERVIEW

- 6.3.1 The Western Cleddau SSSI is designated primarily for its populations of otter (*Lutra lutra*), bullhead (*Cottus gobio*), river lamprey (*Lampetra fluviatilis*), and brook lamprey (*Lampetra planeri*). It demonstrates a variety of river habitats, including (but not limited to) beds of submerged aquatic plants dominated by *Ranunculus spp.*

SITE MANAGEMENT STATEMENT

- 6.3.2 The competent authorities (NRW & NE) both produce Site Management Statement's (SMS's), which outline the features that inform the overall status of a designated site. There are 6 special features that inform the site in question:
- ◆ River habitats including water crowfoot habitat
 - ◆ Associated riverside habitats (including semi-natural broadleaved woodland, scrub, marshy grassland, swamp and mire)
 - ◆ Otter
 - ◆ Bullhead
 - ◆ Brook Lamprey
 - ◆ River Lamprey
 - ◆ Sea Lamprey
- 6.3.3 In addition to the highlighted features of importance, the SMS also outlines potential damaging vectors to a designated site feature, summarised as Potentially Damaging Operations (PDO) lists.
- 6.3.4 Below are the activities considered relevant to the proposed project (Table 3 below).

Table 7: PDO list from NRW Designated Site Finder Tool.

SMS Ref No:	Type of operation
11.	Destruction, displacement, removal or cutting of any plant or plant remains, including tree, shrub, waterweed, herb, hedge, dead or decaying wood, moss, lichen, fungus, leaf-mould, turf or peat
12.	Tree and/or woodland management including planting, felling, pruning and tree surgery, thinning, coppicing, changes in species composition and removal of fallen timber.
20.	Extraction of minerals including peat, shingle, hard rock, sand and gravel, topsoil, subsoil and spoil.
21.	Destruction, construction, removal, rerouting, or regrading of roads, tracks, walls, fences, hardstands, banks, bridges, dams, weirs, ditches or other earthworks, including soil and rock exposures and bank protection works.
23.	Erection of permanent or temporary structures or the undertaking of engineering works, including drilling or the laying, maintenance or removal of pipelines and cables, above or below ground.



6.4 SIR BENFRO FOROL / PEMBROKESHIRE MARINE - SPECIAL AREA OF CONSERVATION (SAC)

- 6.4.1 The SAC extends from just north of Abereiddy on the north Pembrokeshire coast to just east of Manorbier in the south. It includes the coast of the islands of Dewi / Ramsey, Sgomer / Skomer, Grassholm, Sgogwm / Skokholm, the Bishops and Clerks and The Smalls.
- 6.4.2 The SAC encompasses a range of marine habitats and species, some of which are unique in Wales. Habitat and biological diversity are of great importance throughout the site, particularly the well documented reef habitats and the Aberdaugleddau / Milford Haven ria-estuary

Table 8: Annex I & II Features present within the designated site.

Annex I habitats that are a primary reason for selection of this site	
1130	Estuaries
1160	Large shallow inlets and bays
1170	Reefs
Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site	
1110	Sandbanks which are slightly covered by sea water all the time
1140	Mudflats and sandflats not covered by seawater at low tide
1150	Coastal lagoons * Priority feature
1330	Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)
8330	Submerged or partially submerged sea caves
Annex II species that are a primary reason for selection of this site	
1364	Grey seal <i>Halichoerus grypus</i>
1441	Shore dock <i>Rumex rupestris</i>
Annex II species present as a qualifying feature, but not a primary reason for site selection	
1095	Sea lamprey <i>Petromyzon marinus</i>
1099	River lamprey <i>Lampetra fluviatilis</i>
1102	Allis shad <i>Alosa alosa</i>
1103	Twaite shad <i>Alosa fallax</i>
1355	Otter <i>Lutra lutra</i>

6.5 MILFORD HAVEN WATERWAY - SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

- 6.5.1 Milford Haven Waterway is of special interest for its geology, ancient woodland, marine biology, saltmarsh, swamp, saline lagoons, rare and scarce plants and invertebrates, nationally important numbers of migratory waterfowl, greater and lesser horseshoe bats *Rhinolophus ferrumequinum* and *R. hipposideros*, and otter *Lutra lutra*. The site extends from the mouth of the Haven at Dale Point and Thorn Island to the upper reaches of the Daugleddau at Haverfordwest in the west and Blackpool Mill in the east.



6.6 ANNEX I HABITAT WITHIN PROJECT AREA



Figure 4: Indicative Annex I Habitats in proximity to works.

6.6.1 Using the available data from the CCW (now NRW) Designated Habitat Map Data (Figure above), the relevant Annex I Habitats in relative proximity to the project footprint are:

- ◆ 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritima*)
- ◆ 1130 Estuaries

6.6.2 The above habitats will be directly discussed in the latter sections, however other Annex I habitat further downstream will benefit indirectly from proposed mitigation measures.



Table 9: Potential fish species at risk from your activity, but only if your activity is in an estuary or could affect fish in or entering an estuary.

Consider if your activity:	Biology fish risk issue(s)
Is in an estuary and could affect fish in the estuary, outside the estuary but could delay or prevent fish entering it or could affect fish migrating through the estuary	Works will be restricted to the upper bridge structure only, with no physical impediment to fish passage along the estuary.
Could 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)	Please refer to information above. Works will not cause a barrier to migrating fish species.
Could cause entrainment or impingement of fish	No identified impacts.



6.7 SECTION 3: WATER QUALITY

6.7.1 Stage 3 - Consider if water quality is at risk from your activity.

Table 10: Water body summary table to find information on phytoplankton status and harmful algae.

Consider if your activity:	Water quality risk issue(s)
Could affect water clarity, temperature, salinity, oxygen levels, nutrients or microbial patterns continuously for longer than a spring neap tidal cycle (about 14 days)	Sediment Release: Very limited, with only earth along the vegetated bank being directly interfaced with. Use of Hydrocarbons: No refuelling of equipment will occur within the bay. All items of static equipment will be placed within a plant nappy when not in use. Fuelled equipment will be checked for defects and leaks prior to the start of each shift. Within the compound, a refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose. Network Rail have a spillage plan and specialised contractor in place to respond to and clean up spills. Impact Assessment – To assess the potential impacts of these activities, the following should be considered: Fuel powered equipment will be used on the asset within the estuary/bay and hence there is a heightened risk of hydrocarbon release due to leaks of fuels and oils. The contractor will refer to guidance from: ◆ GPP 2 - Above ground oil storage tanks, ◆ GPP 5 - Works and maintenance in or near water, ◆ GPP 7 - Safe storage – The safe operation of refuelling facilities, ◆ GPP 21 - Pollution incident response planning, ◆ GPP 22 - Dealing with spills, ◆ GPP26 - Safe storage – drums and intermediate bulk containers. This includes controls for the operation of equipment using biodegradable hydraulic oil (where this is within the manufacturers permitted specification), the re-fuelling of equipment, inspection and maintenance routines to identify defects which could result



Consider if your activity:	Water quality risk issue(s)
	in the release of liquids, biosecurity protocols, silt mitigation procedures, waste management procedures. The ESMP also includes details on incident response and reporting, including hydrocarbon spills, remediation and reporting to NRW. Conclusion: Provided detailed mitigation plans are developed as part of the Task Specific Method Statements, in line with the broad guidance above, risks to water clarity, temperature, salinity, oxygen levels, nutrients or microbial patterns have therefore been assessed as low.
Is in a water body with a phytoplankton status of moderate, poor or bad	N/A (No Data)
Is in a water body with a history of harmful algae	N/A



Table 11: Assessing whether water quality is at risk from your activity through the use, release or disturbance of chemicals.

If your activity uses or releases chemicals (for example through sediment disturbance or building works) consider if:	Water quality risk issue(s)
The chemicals are on the Environmental Quality Standards Directive (EQSD) list	Impact Assessment: Chemicals which will be taken into the estuary as part of the works will be: Hydrocarbons within machinery. Conclusion: Provided the project complies with the measures set out within the ESMP, which in turn contains guidance from the relevant GPPs, the risk of release of hydrocarbons and cementitious materials is low.
It disturbs sediment with contaminants above Cefas Action Level 1	Impact Assessment: There is a low risk of sediment release during disturbance to ground at the base of scaffolding supports along the rear of the river bank. Conclusion: Risks from sediment release are negligible.



Table 12: Assessing whether project falls within mixing zone.

If your activity has a mixing zone (like a discharge pipeline or outfall) consider if:	Water quality risk issue(s) / Assessment of Risk / Mitigation Proposals.
The chemicals released are on the Environmental Quality Standards Directive (EQSD) list	The works are maintaining an existing asset.

⁵ Carry out your impact assessment using the Environment Agency's surface water pollution risk assessment guidance, part of Environmental Permitting Regulations guidance.

6.8 SECTION 4: WFD PROTECTED AREAS

6.8.1 Stage 4 is to consider if WFD protected areas are at risk from your activity. These include:

- ◆ Special Areas Of Conservation (SAC)
- ◆ Special Protection Areas (SPA)
- ◆ Shellfish Waters
- ◆ Bathing Waters
- ◆ Nutrient Sensitive Areas

Table 13: Location of protected areas in your water body (and adjacent water bodies) within 2km of your activity.

Consider if your activity is: Within 2km of any WFD protected area ⁶	Protected areas risk issue(s)
Western Cleddau River (SAC)	The works will be undertaken within the • Western Cleddau River (SAC). It is not anticipated that there will be any direct impacts on the SAC but without sufficient controls in place, there is potential for the release of deleterious materials from the works. This is considered within the following sections and also in the Habitat Regulations Assessment for the scheme.
Designated Bathing Waters	There is potential for impacts from the works due to the following: - Impacts are unlikely due to the scale and relatively low impact of the proposed works. Mitigation will be implemented as described above. - Reference has been made to GPP 2: Above ground oil storage tanks, GPP 5: Works and maintenance in or near water and PPG 6: Working at construction and demolition sites, GPP 7: Safe storage – The safe operation of refuelling facilities, GPP



Consider if your activity is: Within 2km of any WFD protected area ⁶	Protected areas risk issue(s)
	21: Pollution incident response planning, GPP 22: Dealing with spills, GPP26: Safe storage – drums and intermediate bulk containers in the preparation of the ESMP.
Shellfish Waters	Impacts and proposed mitigation will be the same as for the Designated Bathing Waters area, above.

⁶ Note that a regulator can extend the 2km boundary if your activity has an especially high environmental risk.

6.9 SECTION 5: INVASIVE NON-NATIVE SPECIES (INNS)

6.9.1 Stage 5 is to consider if there is a risk your activity could introduce or spread INNS.

6.9.2 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 other water bodies.

Table 14: Risk from INNS.

Consider if your activity could:	INNS risk issue(s)
Introduce or spread INNS	No INNS have been identified within the worksite. The risk of introducing INNS into the estuary environment will be controlled through Biosecurity Best Practice - Equipment to be used within and adjacent to the estuary will be subject to the Check, Clean, Dry process and will be treated with an aquatic safe disinfectant such as Virkon S. A Biosecurity Management Plan has been prepared for the project, which assesses the risk from INNS and proposes mitigation for this. Please refer to Appendix A.



6.10 SUMMARY OF WFD PRE-ASSESSMENT FINDINGS

Table 15: Summary of Pre-Assessment Stage Findings.

Receptor	Potential risk to receptor?	Note the risk issue(s) for impact assessment
Hydromorphology	The repairs will connect to previous structure repairs along the lower defence alignment. There will be no new independent structures placed into the bay and no temporary structures such as scaffolding used.	Mitigation to be out in place to minimise impacts – Please refer to Table 15 for proposed mitigation.
Biology: habitats	No identified impacts on habitats, provided adequate pollution control measures are put in place i.e. sealed crash deck beneath the structure, controls on the storage and use of hydrocarbons and chemicals, controls on the use of cements, grouts and concrete.	Mitigation to be specified within the Social and Environmental Management Plan (ESMP)
Biology: fish	No identified impact. There will be no physical blocks to fish migrating through the estuary/river. Key impacts on fish will therefore be noise and vibration from works and the use of a equipment near channel. As the works will occur during low tide, noise and vibration will not be transmitted directly into the water column.	As above
Water quality	Potential impacts to water quality has been assessed.	Mitigation for these potential impacts is described within Table 15.
Protected areas	Works will be undertaken within the Western Cleddau River (SAC)	Working procedures and mitigation to be put in place to minimise potential for sediment release and hydrocarbon release. Mitigation described in Table 15.
Invasive non-native species	A Biosecurity Management Plan has been developed for the project, which includes INNS. Please refer to Appendix A.	Please refer to Biosecurity Risk Assessment

6.10.1 The WFD guidance stipulates if a pre-assessment has not identified any receptors at risk during scoping, you don't need to continue to the impact assessment stage and your WFD assessment is complete.

6.10.2 However, if the pre-assessment identifies one or more receptors at risk during scoping, you should continue to the impact assessment stage.



Table 16: Water Framework Directive (WFD) Assessment for the Meirionnydd groundwater waterbody.

WFD elements	Assessment
Chemical status	<u>Temporary impacts during construction</u> No identified impacts <u>Permanent effects during operation</u> No predicted impacts from the operation of the rail structure as it is not proposed to amend the finished level of the railway and hence no excavation will be required and hence no new conduits between the rail track and ground water will be formed. <u>Assessment outcome</u> No adverse effects on the chemical status of the groundwater body have been identified and therefore this is scoped out of further assessment.
Quantitative status	<u>Temporary impacts during construction</u> No interaction with groundwater during construction. <u>Permanent effects during operation</u> No predicted impacts from the operation of the rail structure. <u>Assessment outcome</u> Effects to the quantitative status of the groundwater body have been scoped out of further assessment.



7 PROPOSED PROJECT MITIGATION

7.1 CONSTRUCTION PHASE MITIGATION

7.1.1 In Table 15 below, measures have been set out detailing mitigation to be implemented to minimise the potential project impacts.

Table 17: Proposed Mitigation Matrix.

Potential Hazard	Mitigating Circumstances / Mitigation Measures	Likelihood of Impact with Mitigation
Estuarine habitat - Loss of habitat from project activities.	During the project, all welfare, storage, parking and general works will occur within third party agricultural fields and the immediate area below the structure during low tide only. No Annex I habitat removal is required. The only physical interaction with the bay bed will be during the low tide periods where vehicle access along the beach areas of sand / silt below the structure (not rocky areas, see below) to undertake the remedial works. Plant/machinery will not deviate from the designated routes at any time. Personnel will walk along the available public footpath or access route. No walking over the saltmarsh is permitted.	Negligible likelihood of significant impacts.
Salt marshes (also part of estuarine habitat) - Loss of habitat from project activities.	No loss of habitat is projected to occur as all site access takes place landward of the proposed works. No vehicle or pedestrian access into the saltmarsh habitats.	Negligible likelihood of impacts, with suitable mitigation in place.
Mudflats and sandflats not covered by seawater at low tide – muddy gullies in the Estuary - Loss of habitat from project activities.	Access will be limited to the existing footpaths, roads and vegetated areas directly below the bridge structure. There is no direct access into the lower river or river bed itself.	Negligible likelihood of impacts.
Release of contaminative chemicals from sediments within the estuary/river	Unlikely, no direct contact with river bed is proposed.	Negligible likelihood of impacts with mitigation in place.
Contamination of the estuary from spillage of hydrocarbons during refuelling of plant and equipment or due	Plant/Machinery will only operate in low tide conditions and will be removed from the estuary ahead of the rising tide. Provision will be made to remove broken down plant / vehicles or plant and vehicles which become bogged down. No refuelling of plant machinery or equipment will occur within the estuary habitat. All items of static plant will be paced within a plant nappy when in use or being stored.	Negligible likelihood of impacts with mitigation in place.



Potential Hazard	Mitigating Circumstances / Mitigation Measures	Likelihood of Impact with Mitigation
to equipment failure.	Plant will be checked for defects and leaks prior to the start of each shift. Bulk fuels will be stored in a bowser with secondary containment. This will be located in the site compound. Within the compound, a refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose. Network Rail have a spillage plan and specialised contractor in place to respond to and clean up spills. The Contractor will develop and implement an Emergency Awareness and Response Plan. This will describe how spills will be contained and cleaned up. The emergency plan will appoint an Incident Coordinator, define roles and responsibilities during an incident, detail response procedures and contain an inventory of response equipment to be maintained on site. Plant will also be available to remove contaminated ballast from site if required. All machinery entering the estuary will undergo regular checks and only use approved biodegradable oils. If oil leaks or damage to hydraulic hoses is noted, plant and machinery will be removed from the site and isolated within the site compound with containment measures beneath the leak, until it has been repaired and signed off by a competent fitter. The contractor will develop and emergency response plan in the event a machine becomes standard in the estuary from mechanical failure. Equipment will be available to syphon the fuel from the disabled machine in order to reduce the potential release of hydrocarbons into the estuary/bay.	
Contamination of the estuary from release of concrete.	Works will only occur during low tide conditions. Concrete used will be a rapid drying marine standard which will have cured by the time the tide returns to the working area. No concrete / cementitious materials will be stored in areas within the tidal range of the estuary or in areas liable to flooding.	Negligible likelihood of impacts with mitigation in place.
Aggregations of non-breeding birds Noise disturbance / Visual Disturbance / Habitat Destruction.	Project activities will create a source of light and noise over 8-12 hours during the day. Times will vary depending on specific tasks. Working hours will be generally between 07:00-19:00 As working hours are not continuous there will be periods where birds are not disturbed by site activities during the early mornings and night. It is likely that local bird populations are habituated to a level of human activities.	Negligible likelihood of impacts with mitigation in place.
Individual wintering birds - Noise disturbance / Visual Disturbance / Habitat Destruction.	The works are scheduled to occur within circa October-November 2025, outside of the important peak wintering period.	Impact Not Likely to be Significant



Potential Hazard	Mitigating Circumstances / Mitigation Measures	Likelihood of Impact with Mitigation
Otter - Noise disturbance / Visual Disturbance / Habitat Destruction.	Toolbox Talks will inform site personnel on identifying the Annex II Species. No otter holts have been noted to date within proximity to the structure, access route or Morfa Compound area. The project does not represent a hard boundary preventing access to the wider estuary by this species. Habitat impact is limited, however there may be a temporary impact to prey species disturbed by ongoing works. It is not anticipated that these works will have an impact on the population. Additionally, no equipment or excavation will be left in such a manner that during high tide an animal could become snared and trapped within the working area. Should an Otter be encountered during works, personnel will temporarily stand down until the animal has vacated the immediate area under its own volition. Salmon, which are a prey of Otter will not be prevented from travelling up the estuary during the project. Although there will be an elevated human presence around the structure, it is unlikely that this will present an impassable barrier to salmon migrating to spawn. Directional lighting measures as with those proposed for bat species will be implemented for Otter population to limit disturbance.	Impact Not Likely to be Significant, with appropriate mitigation
Fish Assemblage – Pollution and water quality impacts.	Pollution control and Biosecurity measures implemented as described above will minimise water quality impacts on fish species.	Impact Not Likely to be Significant, with appropriate mitigation
Fish Assemblage - Noise disturbance / Visual Disturbance / Habitat Destruction.	The works will be undertaken towards the start of the fish spawning season for migratory fish such as salmon, trout and eel (mid Oct – Mid April). However, no working at the structure within the normal tidal limits. Task lighting will be designed to illuminate the works area but limit light spill into the estuary.	Works have potential to cause a Minor Significant impact.
Fish Assemblage - Contamination of the estuary from spillage	See comments under estuarine habitat	Impact Not Likely to be Significant
Biosecurity	A detailed Biosecurity Plan has been prepared for the project. This includes the following: - All site personnel and site visitors will be informed of any known INNS present on site and that they are jointly responsible for preventing their spread/impacts. They will be made aware of what these species look like so they can avoid it where possible and take appropriate actions. - All site personnel and visitors will be inducted in good biosecurity practices. This will include adoption of the CHECK-CLEAN-DRY campaign (NNSS, 2015). - The CHECK-CLEAN-DRY poster will be displayed in the site office as a reminder of good biosecurity practices: - http://www.nonnativespecies.org/checkcleandry/ - All equipment, tools, vehicles and personal protective equipment (PPE) used on site will be checked for seeds originating from any identified INNS	Impact Not Likely to be Significant



Potential Hazard	Mitigating Circumstances / Mitigation Measures	Likelihood of Impact with Mitigation
	before leaving the area. If seeds from identified invasive species are identified, the items will be cleaned and removed seeds will be destroyed. - The spread of waterborne diseases will be limited through the adoption of the CHECK-CLEAN-DRY campaign. This would entail the use of a suitable disinfectant e.g. Virkon® S Aquatic to decontaminate all machinery and PPE prior to it entering site and upon leaving site. Following application of a suitable disinfectant, machinery and PPE will be allowed to fully dry for at least 72 hours before being used on another aquatic site. The Biodiversity Management Plan can be found in Appendix A.	
Blue Mussels - Contamination of the estuary from spillage and increased sediment loading.	Works will be undertaken at low tide and hence these will not be immediately released into the estuary but there is some potential for incoming tides to wash out small volumes of mobilised sediment.	Impact Not Likely to be Significant
Vascular plant assemblage associated with salt marsh (part of estuarine habitat) - No impact	See comments under estuarine habitat	No impact



8. WFD CONCLUSION

8.1.1 Due to the nature and scale of the works to be undertaken during the Cleddau Bridge remedial works, providing the mitigation outlined within this document and within this document and the supporting Habitat Regulations Assessment (HRA) is implemented, this project will not prevent any of the water bodies associated with the project from meeting their Water Framework Directive objectives.



9 APPENDIX A - BIOSECURITY MANAGEMENT PLAN & RISK ASSESSMENT

