

Marlas Rising Main Scheme

Construction Environmental Management Plan

Burroughs

61161

November 2025



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Scheme Number: **61161**

Version: **P3**

Status: **S3**

Version	Status	Completed by	Checked by	Approved by	Date of version
P1	S3	JC	IB/AG	FV	28.11.25
P2	S3	JC/NH	NH	JC	08.05.26
P3	S3	JC	FV	FV	13.08.26

This report will be deemed to be accepted by the client as final if no comments are received within two weeks of issue.

S0 – Work in progress

S1 – For coordination

S2 – For information

S3 – For review and comment

S4 – For approval

FI – Final

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List of Abbreviations

Abbreviation	Full Description
BNG	British National Grid
CEMP	Construction Environmental Management Plan
Ch.	Chainage
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
ECow	Environmental Clerk of Works
eDNA	Environmental DNA
EMP	Environmental Management Plan
EPS	European Protected Species
GCN	Great Crested Newt (<i>Triturus cristatus</i>)
HSI	Habitat Suitability Index
INNS	Invasive Non-Native Species
LNR	Local Nature Reserve
NRW	Natural Resources Wales
PEA	Preliminary Ecological Appraisal
PRoW	Public Right of Way
RAMS	Risk Assessment and Method Statement
RMS	Reptile Method Statement
SAC	Special Area of Conservation
SINC	Site of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SW	Surface Water
WCA	Wildlife and Countryside Act 1981 (as amended)
WFD	Water Framework Directive
WQ	Water Quality

1 INTRODUCTION

- 1.1.1 The CEMP is a live document that will require updates if there are design or programme changes. This document includes several other plans, reports and schedules of information as appendices, many of which will be added to as the construction phase progresses. These include the following:
- Appendix E1 – Materials and Waste Management Plan (M & WMP)
 - Appendix E2 – Pollution Control Plan (PCP)
 - Appendix E3 – Environmental Method Statements (separate document)
 - Appendix E4 – SSSI Assent (when issued)

2 CEMP CONTEXT

- 2.1.1 During the design development and pre-construction phases of the Marlas Rising Main Scheme, a variety of environmental surveys and assessments were conducted to identify potential environmental constraints and to inform mitigation strategies and design decisions. This Construction Environmental Management Plan (CEMP) outlines mechanisms for implementing and monitoring environmental and ecological commitments and mitigation measures throughout the construction phase, ensuring compliance with relevant environmental legislation and best-practice guidelines.
- 2.1.2 TACP completed a Preliminary Ecological Appraisal (PEA) in January 2024 to establish baseline ecological conditions across the scheme footprint and identify potential ecological constraints related to the proposed replacement of the sewer main between Bridgend and Neath Port Talbot. This assessment was followed by several targeted ecological surveys, including bat surveys of structures, reptile presence/absence surveys, and great crested newt (GCN) surveys, all conducted in accordance with relevant best practice guidelines. Additionally, an Invasive Non-Native Species (INNS) survey was undertaken in September 2025 to identify and map the presence of invasive plant species within and adjacent to the working corridor.
- 2.1.3 Following the progression of the scheme design, an additional area (Phase 5) has been incorporated into the scheme boundary. Environmental baseline information for this area has been obtained through a combination of existing survey data, targeted update surveys (where required), and professional judgement to ensure that ecological constraints and mitigation requirements are fully understood and consistent with the remainder of the scheme.
- 2.1.4 The results were used to inform method statements for specific ecological receptors, ensuring compliance with legislative requirements under the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 (as amended), and the Environment (Wales) Act 2016.
- 2.1.5 This CEMP is part of the overall Scheme Management Plan. The Principal Contractor will manage it throughout the construction phase to ensure that environmental commitments are fully implemented, monitored, and documented.

- 2.1.6 Several environmental management and action documents have been developed to support this CEMP and outline detailed procedures for implementing mitigation measures and ensuring compliance with legislation and best practice guidelines. These documents include, but are not limited to those presented in Table 1.

Table 1 Environmental action documents

Environmental Action Document	Owner
Contract Management Plan Section E – Construction Environmental Management Plan (CEMP)	TACP
Pollution Control Plan (PCP)	TACP
Materials and Waste Management Plan (M&WMP)	AGC/TACP
Programme	AGC
Environmental Method Statement 1 – Bat Roost Inspections and Mitigation	TACP
Environmental Method Statement 2 – Reptile Mitigation and Site Clearance	TACP
Environmental Method Statement 3 – Great Crested Newt Mitigation	TACP
Environmental Method Statement 4 – Invasive Non-Native Species Management	TACP
Environmental Method Statement 5 – General Ecological Site Clearance	TACP
Environmental Method Statement 6 – Biosecurity	TACP / Principal Contractor
Design Input Statement – Environmental	Burroughs/TACP
Design Input Statement – Drainage	DCWW/Burroughs
Detailed Design Change	Burroughs/TACP
Assent to carry out notifiable operations_A0056741_01052026	AGC
GCN licence S095886-2	DCWW

- 2.1.7 Any changes to the published or approved design that occur during detailed design or construction will be recorded as a Detailed Design Change. Should these changes affect existing environmental mitigation or commitments, they will be reviewed and agreed with the relevant statutory environmental bodies (Natural Resources Wales and Bridgend County Borough Council) prior to implementation. This CEMP will be updated accordingly.
- 2.1.8 Upon completion of the works, the Principal Contractor will remain responsible for the environmental aftercare and maintenance of mitigation areas for a five-year post-construction period, administered through a Maintenance Environmental Management Plan (MEMP). Following this period, long-term management responsibility for the scheme and its associated environmental mitigation will transfer to Dŵr Cymru Welsh Water (DCWW). A Handover Environmental Management Plan (HEMP) will be prepared at this stage, setting out proposed management and monitoring actions for the subsequent operational period.

- 2.1.9 The interrelationship between the different environmental management documents that will ensure all legislative requirements, best practice guidance, and ecological commitments are implemented during the detailed design, construction, post-construction, and operational phases is illustrated in the accompanying CEMP flow diagram.

3 ROLES AND RESPONSIBILITIES

3.1 Environmental Coordinator

- 3.1.1 The Environmental Coordinator (ECO) is responsible for overseeing the work of environmental specialists and contributing to the overall development of the Scheme's design.
- 3.1.2 The ECO is tasked with coordinating and attending meetings and consultations that are necessary for addressing the environmental and sustainable construction aspects of the Scheme. These meetings include:
- Biweekly progress meetings
 - Biweekly programme meetings
- 3.1.3 The ECO is also tasked with preparing the necessary Method Statements to meet the conditions and requirements for European Protected Species, UK Protected Species, Discharge Consents, and other statutory provisions.

3.2 Environmental Clerk of Works

- 3.2.1 The Environmental Clerk of Works (ECoW) will provide an on-site presence during the construction phase and shall support the ECO.
- 3.2.2 They will be responsible for ensuring all relevant licences, consents and method statements are in place prior to construction activities, maintaining, updating and auditing the CEMP.
- 3.2.3 The ECoW shall also be responsible for undertaking toolbox talks for site staff and directing site staff on environmental issues.
- 3.2.4 Contact information for the Environmental Clerk of Works is provided below Table 2:

Table 2 ECoW Details

Name	Role	Organisation	Telephone	Email	Address
Joseph Coyle	Scheme ecologist	TACP			4 th Floor James Williams House, 9 Museum Place, Cardiff. CF10 3BD

3.3 Other environmental staff

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Marlas Rising Main Scheme
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3.3.1 The core scheme team for the Kenfig Hill Foul Sewer Main Rising Scheme will be supported by a range of environmental specialists throughout both the construction and five-year post-construction aftercare periods. These specialists will be available to provide technical input, undertake specific environmental monitoring, and ensure that environmental commitments and mitigation measures are implemented in accordance with relevant legislation, planning conditions, and best practice guidance.

3.3.2 The range of environmental disciplines that may be called upon includes:

- Landscape Architects
- Ecologists
- Water Quality Specialist / Hydrologists
- Geologist
- Archaeologist

3.3.3 Contact information for the Environmental Specialists is provided below in Table 3:

Table 3 Contact Information

Role	Organisation	Name	Email
Landscape Architect	TACP	Sally Newton	[REDACTED]
Ecologist / Environmental Clerk of Works	TACP	Joseph Coyle	[REDACTED]
Water Quality Specialist			
Geotechnical / Geological Specialist	TACP	Agnieszka Kowalska	[REDACTED]
Site Management Team	Alun Griffiths (Contractors) Ltd	Patrick Sheehan	[REDACTED]
Archaeological Specialist	As appointed	Sophie Lewis-Jones	[REDACTED]

4 STAKEHOLDER

4.1 Environmental Stakeholder Contact Information

4.1.1 Contact details for statutory consultees, non-statutory bodies, and landowners will be maintained in the Stakeholder Directory, accessible to Dŵr Cymru Welsh Water, Burroughs, TACP, and Alun Griffiths site management teams.

4.1.2 Table 4 contains stakeholder contact information.

Table 4 Stakeholder Contact Information

Organisation	Role / Interest	Representative	Telephone	Email
Dŵr Cymru Welsh Water	Scheme Promoter / Client	Andrew Davies	N/A	
Burroughs	Design Consultant	Neil Williams	N/A	
Alun Griffiths (Contractors) Ltd.	Principal Contractor / Site Environmental Team	Patrick Sheehan		
TACP	Environmental Consultant / Ecologists	Joseph Coyle		
Natural Resources Wales (NRW)	Statutory Environmental Regulator	Nick Sharp (conservation officer)	N/A	
Bridgend County Borough Council	Local Planning Authority			
Neath Port Talbot County Borough Council	Local Planning Authority			
Landowners - Agent	Private / Managed Landowner	Mari Jackson-Lewis	N/A	

Where additional landownership or stakeholder interests are identified in relation to the Phase 5 area, these will be incorporated into the Stakeholder Directory prior to the commencement of works in that area. Engagement with NRW will be maintained where required in relation to licensing requirements.

4.2 Environmental Key Performance Indicators (KPI)

- 4.2.1 The KPI requirements for this scheme currently relate to the GCN NRW Licence 61161_REP_SchemeToAudit_P1_S2. A Key Performance Indicator (KPI) process will be implemented by the Principal Contractor's Environmental Manager.

5 PRE-CONSTRUCTION ENVIRONMENTAL INFORMATION.

5.1 Environmental Features and Restrictions

5.1.1 The constraints identified in Table 5 below are based on the current scheme footprint and baseline information available at the time of writing. Additional constraints identified within subsequently incorporated areas are reflected within the table where relevant.

Table 5 Environmental features and constraints

Existing Environmental Features	Constraints
Rivers / Streams / Brooks	The Afon Cynffig bisects the scheme. Tributary channels and drainage ditches cross Margam Moors SSSI, forming part of the local rhyne system. Works in these watercourses have the potential to release sediment, cause pollution, or introduce nutrients during excavation or pipeline installation. Seasonal restrictions apply for in-stream works to avoid impacts on wintering birds and amphibians.
Ponds	There are four ponds located within 500 meters of the proposed pipeline alignment. Of these, Pond 4 contains Great Crested Newts (<i>Triturus cristatus</i>). A construction buffer will be established for areas where GCN presence has been confirmed, and it is essential to maintain terrestrial connectivity around the ponds.
Rhyne System (Margam Moors)	The network of ditches and small channels supports aquatic and semi-aquatic habitats, including amphibians and macroinvertebrates, and provides feeding habitat for wintering birds. Excavation or access to these features may cause hydrological disturbance, so temporary diversion or protective fencing may be required during construction.
SSSIs	Kenfig Hill SSSI contains dune and grassland habitats that support breeding and wintering bird populations, reptiles and areas of invasive non-native species. Margam Moors SSSI consists of wet grassland and reedbeds supporting wintering birds, amphibians and semi-natural wetland habitats.
Protected / Notable Species	A lesser horseshoe bat (<i>Rhinolophus hipposideros</i>) roost has been recorded in Building 1, and flight lines must be maintained with light spill mitigated. Reptiles present on site include slow worm (<i>Anguis fragilis</i>), common lizard (<i>Zootoca vivipara</i>), and grass snake (<i>Natrix helvetica</i>), requiring exclusion zones, translocation, and staged clearance prior to works. Hazel dormouse (<i>Muscardinus avellanarius</i>) surveys returned no evidence of presence, but precautionary measures are recommended. Wintering birds recorded include snipe and reed bunting, which require disturbance minimisation during works. Invasive non-native species present include Japanese knotweed (<i>Renoutria japonica</i>), Himalayan balsam (<i>Impatiens glandulifera</i>), montbretia (<i>Crocasmia × crocosmiiflora</i>), Himalayan cotoneaster (<i>Cotoneaster simonsii</i>), and wall cotoneaster (<i>Cotoneaster horizontalis</i>); biosecurity measures, containment, and removal are required and detailed in the INNS management plan.

5.2 Abstraction and Discharges

A temporary and permanent FRAP has been submitted to NRW referenced DFR/S/2026/0006

5.3 Pre-Construction Ecological Surveys

5.3.1 The surveys presented in Table 6 reflect the baseline ecological data for the scheme. Where additional working areas fall outside the originally surveyed footprint, these areas have been reviewed against existing survey data and, where necessary, updated or supplementary surveys and/or pre-construction checks have been undertaken to ensure that ecological constraints are appropriately identified and mitigated prior to works commencing.

Table 6 Pre-Construction Surveys

Date of Survey	Company	Species / Survey Type	Outcome / Comments
May 2024	TACP	Great Crested Newt (<i>Triturus cristatus</i>)	Habitat Suitability Index (HSI) assessments were undertaken across all waterbodies within 500 m of the proposed foul main alignment on 8–9 May 2024. Waterbodies with HSI >0.5 and suitable ditches were surveyed using torchlight searches, egg searches, bottle trapping, and terrestrial refuge searches. Two great crested newts were identified during bottle trapping in one pond. eDNA results did not identify any GCN in the ponds or rhynes.
May–July 2024	TACP	Bats (Roost and Activity Surveys)	The Preliminary Ecological Appraisal identified several buildings with bat-roost potential. Hibernation surveys were completed in February 2024, followed by dusk- and dawn-activity surveys between May and July 2024. A lesser horseshoe bat (<i>Rhinolophus hipposideros</i>) roost of approximately 20 individuals was recorded in Building 1. Mitigation will include retaining the roost, controlling light spill, and protecting the flight line.
May–September 2024	TACP	Reptile Surveys (Slow worm, Common lizard, Grass snake)	Reptile mats were deployed in May 2024 after a two-week bedding-in period. Seven presence/absence visits followed by population assessments (20 visits). Totals recorded: 132 slow worms (<i>Anguis fragilis</i>), 31 common lizards (<i>Zootoca vivipara</i>), and seven grass snakes (<i>Natrix helvetica</i>).
May–October 2024	TACP	Hazel Dormouse (<i>Muscardinus avellanarius</i>)	Nest tube survey deployed in May 2024 and monitored through the active season. No evidence of dormouse activity recorded.

September 2024	TACP	Invasive Non-Native Species (INNS) Survey	Invasive species recorded during late-season survey, including Japanese knotweed (<i>Renoutria japonica</i>), Himalayan balsam (<i>Impatiens glandulifera</i>), montbretia (<i>Crocsmia × crocosmiiflora</i>), western skunk cabbage (<i>Lysichiton americanus</i>), Himalayan cotoneaster (<i>Cotoneaster simonsii</i>), and wall cotoneaster (<i>Cotoneaster horizontalis</i>). These were underrepresented in the January PEA due to seasonal dieback.
October 2025	TACP	Wintering Bird Survey	Survey of reedbeds, hedgerows, and grasslands adjacent to Kenfig Hill and Margam Moors SSSI completed. Works to proceed under ecological watching brief where required.
October 2025	TACP	Water Quality Monitoring	Baseline water quality sampling completed on local drains and surface water bodies within 500 m of the proposed pipeline alignment. Parameters monitored included pH, temperature and turbidity. Monitoring is scheduled during construction to ensure compliance.

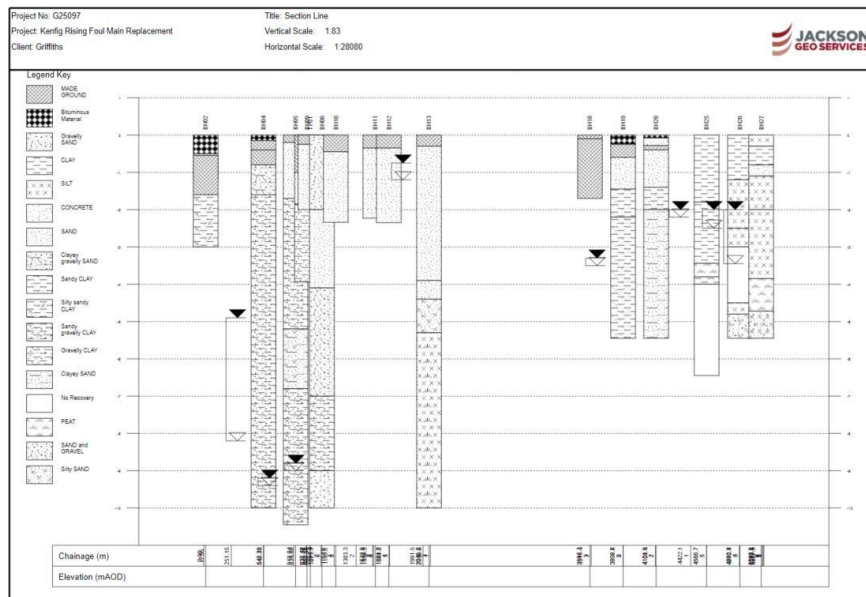
5.4 Pre-construction Groundwater and Surface Water

5.4.1 The ground conditions encountered during the fieldwork were broadly consistent with the anticipated ground conditions. The ground conditions encountered are summarised within the Table 7.

Table 7 Ground conditions

Stratum	Top Depth (m bgl)	Maximum thickness (m)	Remarks
Topsoil and Made Ground	Ground level	1.70	Encountered within BH02, BH03, BH04, BH05, BH09, BH10, BH11, BH12, BH13, BH18, BH19, BH20, BH21, BH27, BH28 and TP01
Peat	3.44	0.87	Encountered within BH25 and BH27
Tidal Flat Deposits	Ground level	8.40	Encountered within BH03, BH04, BH05, BH06, BH08, BH19, BH20, BH21, BH25, BH26, BH27 and TP01
Blown Sand	Ground level	4.10	Encountered within BH04, BH05, BH06, BH07, BH08, BH09, BH10, BH11, BH12, BH13, BH19, BH20, BH27, BH28
Alluvium	4.00	6.60	Encountered within BH13 and BH28
Glaciofluvial Deposits	1.60	2.90	Encountered within BH02, BH06 and BH09

5.4.2 Variations in depth of these materials against ground level are shown in the simplified section below:



- 5.4.3 Topsoil was encountered only within BH27 and comprised a firm dark brown slightly sandy silt with frequent roots and rootlets. The encountered Made Ground was highly variable in nature and generally thin. The encountered materials comprises a variety of different materials, but could be generalised as comprising macadam, concrete, angular to subangular fine to coarse gravel of sandstone, slag, limestone, concrete and coal, rarely with medium cobble content and gravelly fine sand to coarse sand, rarely with low cobble content.
- 5.4.4 Groundwater strikes occurred within exploratory hole locations BH04, BH05, BH06, BH08, BH13, BH19, BH25, BH26, BH27 and BH28. Records of the strikes are presented within the Table 8 below.

Table 8 Groundwater strikes

Exploratory Hole Location	Depth of Strike	Depth after 20mins
BH04	8.20	8.20
BH05	9.40	9.40
BH06	9.00	9.00
BH08	1.50	1.50
BH13	1.20	1.20
BH19	3.50	3.50
BH25	2.20	2.20
BH26	2.50	2.50
BH27	3.45	3.45
BH28	1.20	1.20

- 5.4.5 The above information indicates that groundwater discontinuous and likely comprises a series of perched aquifers.
- 5.4.6 During the return monitoring visits, groundwater was generally encountered at between 0.80 m and 1.20 m depth in the shallow wells. Within the deeper well installed in BH06, groundwater was encountered at 7.50 m.
- 5.4.7 It should be noted that groundwater levels are influenced by seasonal fluctuations and therefore may vary when compared to the levels observed during the fieldwork period.

5.5 Indicative List of Waste Code

- 5.5.1 The assessment of the waste indicates a likely suitable List of Waste (LoW) code for the tested samples could be '17 05 04 Soil and stones other than those mentioned in 17 05 03', i.e. non-hazardous waste, with the exception samples from BH02 0.50 – 0.55 m and BH21 0.70 – 0.80 m which should be attributed the LOW '17 05 03 Soil and stones containing hazardous substances'.

5.6 Second Phase Classification - Waste Acceptance Criteria (WAC)

- 5.6.1 Full WAC testing, comprising single-stage 1:10 leachate, has been carried out on all samples, which were initially classified as non-hazardous waste.
- 5.6.2 Materials classified as non-hazardous may be disposed of at inert landfill subject to meeting inert WAC thresholds, whilst materials which exceed the inert WAC should be disposed of as non-hazardous waste.
- 5.6.3 No samples exceeded the inert WAC thresholds, and as such, the material is considered to be inert waste.
- 5.6.4 Full WAC testing comprising single stage 1:10 leachate has been carried out on all samples, which were classified as hazardous waste. These samples meet the disposal criteria to be classified as stable, non-reactive, hazardous waste with the exception of BH02 0.50-0.55m which exceeds the criteria for TOC. It is recommended that discussion is had with the waste receiver to confirm they are willing to accept the material as stable, non-reactive, hazardous waste.

5.7 Classification of Macadam

- 5.7.1 Macadam materials which contain coal tar are considered to be hazardous waste where the level of coal tar exceeds 0.1 %.
- 5.7.2 Two macadam samples from BH02 and BH03 were analysed for coal tar. Coal tar has been observed to be present within both samples. It is therefore considered that the macadam onsite should be disposed of as hazardous waste.

5.8 Indicative Waste Classification Summary

- 5.8.1 This indicative waste classification has determined that the materials in the vicinity of BH02
- 5.8.2 0.50 – 0.55 m and BH21 0.70 – 0.80 m should be attributed the LOW '17 05 03 Soil and stones containing hazardous substances' and be disposed of stable, non-reactive, hazardous waste pending acceptance by the waste receiver of the elevated levels of TOC within sample BH21 0.70 – 0.80 m.
- 5.8.3 The sample of macadam tested from BH02 and BH03 indicate the presence of coal tar and that the macadam should be disposed of as hazardous waste.
- 5.8.4 The remaining samples tested have a classification of inert waste and a LOW code '17 05 04 Soil and stones other than those mentioned in 17 05 03'.
- 5.8.5 It should be noted that all wastes removed from site should be assessed and attributed classification in accordance with UK legislation prior to their transport and disposal.

5.9 Designated Sites and Sensitive Features

- 5.9.1 Table 9 presents the designated sites and key sensitive ecological features identified within and adjacent to the scheme. These features have been identified through baseline surveys, a desk study, and consultation outputs and represent the primary environmental receptors that require consideration during construction.
- 5.9.2 The table highlights the location and ecological significance of each feature and summarises the associated constraints relevant to the proposed works. Where additional working areas are incorporated into the scheme, these have been reviewed against the existing baseline to ensure that any relevant designated sites or sensitive features are appropriately considered and addressed through the mitigation measures set out in this CEMP.

Table 9 Designated sites and features

Designation	Location	Details
Kenfig Hill SSSI	Bisected by the proposed foul main alignment	Site of national importance protected under the Wildlife and Countryside Act 1981 (as amended). Himalayan balsam (<i>Impatiens glandulifera</i>) was recorded within and around the SSSI.
Margam Moors SSSI	Wet grassland, reedbeds, and rhynes	Site of national importance protected under the Wildlife and Countryside Act 1981 (as amended). Schedule 1 birds recorded include water rail (<i>Rallus aquaticus</i>) and little egret (<i>Egretta garzetta</i>). Bat activity was noted in the wider area during surveys, though no confirmed roosts were within the SSSI. Himalayan balsam (<i>Impatiens glandulifera</i>) is present.
Pond 4	Within the scheme boundary, outside of SSSIs	Supports great crested newts (<i>Triturus cristatus</i>), with two individuals recorded during bottle trapping surveys. eDNA confirmed the absence of great crested newts in the remaining ponds. Pond margins and surrounding terrestrial habitats are used by reptiles (slow worm, common lizard, grass snake).
Bat roost building	Outside SSSIs, along pipeline alignment	A lesser horseshoe bat roost of approximately 20 individuals was identified in Building 1. Bat activity corridors extend across the surrounding habitat.
Other	Outside of SSSIs, along pipeline alignment	Japanese knotweed was recorded within the central section of the scheme. Other INNS include montbretia, Himalayan balsam, Himalayan cotoneaster, western skunk cabbage and wall cotoneaster.

5.10 Licences & Consents in place

- 5.10.1 A GCN licence has been granted for the Scheme S095886/1.
- 5.10.2 A permanent and temporary FRAP has been submitted to NRW. Reference numbers pending acceptance.

6 MANAGEMENT OF ENVIRONMENTAL ISSUES

6.1 Ecological Protection

Overview

- 6.1.1 The scheme is situated next to the Margam Moors SSSI and Kenfig Hill SSSI and intersects a network of semi-natural habitats, including wet woodlands, dunes, scrub, rhyne systems, semi-improved grassland and runs adjacent to ponds. Sensitive ecological receptors confirmed or likely to be present in the area include bats, reptiles, and wintering birds, along with potential habitat for the great crested newt (all eDNA results have returned negative). There is also potential otter habitat, as well as the presence of INNS. The Afon Cynffig flows through the working corridor, making the surrounding riparian habitat and water quality particularly sensitive.
- 6.1.2 All work will be conducted in compliance with current wildlife legislation, the requirements set forth by Natural Resources Wales, BS 42020:2022 (Biodiversity Code of Practice for Planning and Development), and the scheme's Ecological Method Statements.
- 6.1.3 Where additional working areas are brought forward during the construction phase, these will be subject to the same ecological protection measures set out within this CEMP and the approved Environmental Method Statements. Appropriate pre-construction checks, ecological supervision, and mitigation will be implemented where required to ensure compliance with relevant legislation and protected species licences
- 6.1.4 Table 10 contains the sensitive ecological receptors.

Table 10 Receptors

Receptor	Status	Location / Notes
Bats	EPS / WCA protection	Roost confirmed in Building 1 outside SSSI; linear riparian features on site used for foraging and commuting
Reptiles (slow-worm, common lizard, grass snake)	WCA protection	Recorded throughout the site.
Great crested newt	EPS / WCA protection	Pond 4 has confirmed the issue; however, precautionary measures are required for the rest of the scheme.
Birds	WCA Schedule 1	Scrub, woodland and grassland provide nesting opportunities throughout the scheme.
Wet woodland	Priority habitat	Occurs adjacent to the working corridor.
Rhyne system & ponds	Priority aquatic features	Important for invertebrates, wading birds and hydrology.
INNS	WCA schedule 9 and the Invasive Alien Species Act	Himalayan balsam is widely present, while Japanese knotweed, cotoneaster sp, monbretia, and western skunk cabbage are found in isolated areas.

6.2 Archaeological & Heritage Protection

- 6.2.1 The site is situated in an area rich in historical and cultural significance, encompassing industrial heritage features tied to historic land drainage, agricultural improvements, and transportation and water management infrastructure related to the wider Margam estate and the South Wales industrial landscape. While there are no Scheduled Monuments or Listed Buildings within the immediate work area, there remains archaeological potential, particularly concerning historic field boundaries, former drainage features, and subsurface remnants associated with the historical land use of the Margam Moors and the surrounding agricultural landscape.

6.3 Control Of Nuisance

- 6.3.1 Construction activities can create nuisance impacts for nearby residents, public users of the surrounding area, and sensitive ecological features. The main nuisance factors include noise, vibration, dust, artificial lighting and visual disturbances. The contractor will implement a range of measures to minimise these impacts and ensure compliance with relevant legislation, planning conditions, and best practices.

Noise & Vibration Control

- Plant and machinery will be equipped with suitable silencers and will be maintained in good working condition.
- Where possible, electrically powered equipment will be used instead of diesel-powered machinery.
- Static equipment will be placed away from sensitive areas whenever feasible.
- Work schedules will be designed to avoid high-impact activities during early morning, late evening, and nighttime periods.
- Vibration-inducing activities will be monitored and mitigated in accordance with scheme requirements and guidance from environmental and heritage advisors.

Dust and Air Quality

- Water suppression, dust screens, and wheel washing will be implemented as necessary to prevent dust from migrating off-site.
- Stockpiles will be covered or moistened when needed and will be located away from site boundaries and ecological features.
- Vehicle movements will be minimised through efficient logistics, and haul routes will be maintained to reduce dust release.

Lighting Control

- Temporary lighting will be directed and shielded to prevent light from spilling into nearby habitats, especially wet woodlands, bat foraging corridors, and watercourses.
- Lighting levels will be kept to the minimum required for safe operation and will adopt a dark-sky-friendly approach whenever possible.

Visual

- Hoarding or screening will be deployed where works interface with publicly accessible areas.
- Site compounds and material storage areas will be maintained in a tidy condition to reduce visual intrusion and odour-related nuisance.

Monitoring & Engagement

6.3.2 Regular site inspections will be undertaken to ensure that nuisance-control measures are effective, and the community will be kept informed of especially noisy or disruptive works wherever practicable.

6.4 Control of Nuisance Species

6.4.1 Invasive Non-Native Species are present within the scheme area and will be managed in accordance with:

- Wildlife and Countryside Act 1981 (as amended)
- Environmental Protection Act 1990
- Invasive Alien Species (Enforcement and Permitting) Order 2019 (which enforces the retained EU IAS Regulation)
- Statutory Guidance for Managing INNS

6.4.2 All activities will adhere to the scheme-specific INNS Management Plan, which outlines requirements for survey, biosecurity, treatment, soil handling, monitoring, and record-keeping.

6.4.3 INNS confirmed within the scheme are detailed in Table 11. For mapped locations, see the INNS Management Plan.

Table 11 Confirmed INNS

Species	Scientific Name	Location
Himalayan balsam	<i>Impatiens glandulifera</i>	Widespread across the site, including all watercourse corridors
Japanese knotweed	<i>Reynoutria japonica</i>	Central area and along the River Cynffig
Western skunk cabbage	<i>Lysichiton americanus</i>	Central wetland areas
Wall cotoneaster	<i>Cotoneaster horizontalis</i>	Near M4 bridge
Himalayan cotoneaster	<i>Cotoneaster simonsii</i>	Central, near River Cynffig
Montbretia	<i>Crocasmia × crocosmiiflora</i>	Central, near River Cynffig

Control Measures

Prepared by **TACP** for
Burroughs

Marlas Rising Main Scheme
61161 | P3 | S3

- 6.4.4 All INNS-affected areas will be clearly mapped and marked on site plans.
- 6.4.5 Works to INNS areas will be carried out under supervision by the ECoW.
- 6.4.6 Biosecurity measures will include:
- Cleaning down plant, tools, and PPE
 - Use of designated wash-down zones
 - Material movement controls to prevent the spread of contaminated soils and plant matter
 - No plant, soil, or water from INNS areas may be transported off-site without approval.
 - All staff will receive INNS awareness toolbox talks.
 - Any new INNS discoveries will be reported immediately to the ECoW.
- 6.4.7 For full details of control measures, including chemical, mechanical, and monitoring protocols, see the scheme INNS Management Plan.

6.5 Soil Management

- 6.5.1 All soil handling and storage activities will be carefully managed to prevent erosion, contamination, and the unintended movement of materials across sites. Topsoil and subsoil will be stripped and stored separately in clearly designated, bunded areas to maintain soil integrity and avoid mixing. Stockpiles will be placed away from watercourses, wetlands, dune systems, and other sensitive ecological areas, including the wet woodland habitats identified within the scheme.
- 6.5.2 To ensure stability, stockpiles will have stable side slopes and, where appropriate, will be covered with vegetation, biodegradable matting, or geotextiles to minimise erosion and dust generation. Regular inspections will be carried out to identify and address any signs of instability, erosion, or deterioration.
- 6.5.3 Any soil suspected or confirmed to be contaminated will be segregated, clearly labelled, and handled in accordance with the procedures outlined in the INNS Management Plan. Contaminated soils will be securely stored to prevent leachate or runoff. Whenever feasible, uncontaminated soils will be reused for landscaping, reinstatement, or habitat creation, provided they are verified to be free from debris, waste, and invasive species.
- 6.5.4 Strict biosecurity measures will be implemented during soil movement to prevent the spread of INNS and soil-borne pathogens. All plants, machinery, and equipment used in soil handling will be cleaned before and after use, with special attention given to transfers between sensitive ecological areas, such as dunes, wet woodlands, and watercourse buffer zones.
- 6.5.5 The ECoW will conduct regular inspections of soil management activities. Any evidence of erosion, runoff, or accidental soil deposition outside designated storage or working areas will be addressed immediately, and corrective actions will be recorded to ensure ongoing compliance with environmental protection standards.

6.6 Contaminated Land Management

- 6.6.1 Before and during construction, the ECoW will identify all areas that may have soil contamination. This will be done through desk-based assessments, reviews of historical land-use records, and site-specific investigations. Any soil suspected of contamination will be treated as potentially hazardous until verified otherwise and handled according to the procedures outlined in the scheme's INNS management plan. The ECoW will oversee excavation, storage, and transportation activities to minimise the risk of exposure for site personnel, the public, and the surrounding environment.
- 6.6.2 Contaminated soils will be kept separate from clean materials, clearly labelled, and stored in designated containment areas with bunds. These areas will be located away from watercourses, drainage features, and ecologically sensitive habitats, including dune systems, wet woodlands, and Pond 4, which supports Great Crested Newts (GCN). When necessary, temporary containment measures such as impermeable liners, sealed skips, or protective covers will be employed to prevent leachate generation, dust, or surface runoff.
- 6.6.3 All handling and disposal of contaminated soils will comply with relevant legislation and guidance, including the Environmental Protection Act 1990, the Hazardous Waste (England and Wales) Regulations, and any other applicable statutory codes of practice. Transport and disposal of contaminated materials off-site will only be conducted by licensed contractors using approved waste management facilities, with complete documentation retained as part of the scheme's environmental record.
- 6.6.4 The ECoW will carry out regular monitoring and inspections to ensure compliance with contamination control measures. Any unanticipated contamination discovered during construction must be reported immediately and managed in accordance with the Pollution Control Plan, in consultation with NRW. All incidents, spills, or cross-contamination events will be documented, investigated, and remediated in accordance with NRW guidance and industry best practices.

6.7 Watercourse Protection

- 6.7.1 All works undertaken close to the Afon Cynffig and the rhyne network within Margam Moors SSSI will be planned and managed to prevent any deterioration in water quality or disturbance to the structure or function of these watercourses. Protective buffer zones will be maintained along riverbanks and rhyne margins, retaining existing vegetation wherever possible to stabilise soils and provide natural filtration. Activities requiring access to either the river edge or the rhyne banks will utilise temporary barriers, such as sediment curtains, cofferdams, or equivalent containment measures, to prevent the mobilisation of silt or contaminants. Dewatering operations will be controlled to ensure that turbid water is not discharged directly to any watercourse, with all water passed through settlement facilities or appropriate treatment before release. Plant and machinery will be positioned away from watercourses unless essential for specific tasks, and refuelling will take place offsite in accordance with the SSSI assent conditions. Spill kits will be available in all work areas, and water quality will be monitored against baseline conditions established during pre-construction surveys to ensure no adverse effects occur during construction.
- 6.7.2 Due to the ecological sensitivity of the SSSI, any work carried out within or near the rhyne network will be subject to improved protection measures. The rhyne banks and channels will be regarded as high-value watercourses, and it will not be possible to carry out any excavation, trenching, or other intrusive operations within them. The

pipeline route will use trenchless installation methods so that the pipe passes under the rhyne beds rather than through them, and AG will supply long-section drawings to show this arrangement and to confirm that there will be no direct physical impact. Strict biosecurity measures will be implemented during the works, and any invasive non-native species found at the site will be reported to NRW and removed in line with the relevant legislation. Clearance of vegetation will be limited to the minimum necessary for access, and the ECoW must be consulted before any vegetation is removed to ensure that breeding birds or sensitive habitats are not disturbed. Welfare units and laydown areas will be situated outside the SSSI boundary to prevent unnecessary damage to the habitat.

- 6.7.3 Access to working areas near both the Afon Cynffig and the rhyne network will be carefully managed to minimise ground disturbance. Existing tracks will be used wherever possible, and any temporary tracks created will be reused to limit the number of access routes across the site. The use of matting will be continually assessed to reduce rutting and compaction in soft ground conditions. All personnel will be made aware of the potential presence of protected species, including Great Crested Newt, and work areas will be left in a safe condition at the end of each shift to ensure that no wildlife becomes trapped in excavations or confined spaces. Exclusion zones will be established around watercourse margins using fencing and clear signage to prevent accidental encroachment.
- 6.7.4 At the places where the pipeline passes under the rhyne channels, trenchless techniques such as HDD, thrust-bore or auger-bore will be used in order to avoid disrupting the rhyne banks and the flow of water. The launch and reception pits will be situated outside the buffer zones, and the drilling fluids will be continuously monitored to prevent any accidental discharge. All drilling slurry will be collected and pumped into settlement tanks, with disposal carried out by a licensed waste contractor. It will never be allowed for bentonite or drilling fluid to enter any watercourse in any situation. Spill kits will be placed in all work areas, and trained staff will quickly respond to any accidental release of hydrocarbons, chemicals, or drilling fluids. Any incidents will be reported immediately to ECoW and NRW and corrective actions will be carried out without delay.
- 6.7.5 When the work has been completed, the temporary protective measures will be taken down after approval has been given by the ECoW. The work sites will be restored to their original condition in keeping with the requirement that the areas should be returned to the state they were in before the works started. Any disturbed vegetation will be reestablished with suitable native wetland plants. A final inspection of both the Afon Cynffig and the rhyne network will be carried out, accompanied by photographic records and verification that water quality has returned to baseline levels.

6.8 Waste Management

- 6.8.1 All waste generated during construction will be managed in accordance with the Waste Framework Directive and the principles of the waste hierarchy. The priority will be given to prevention, reuse, and recycling whenever possible. The Site Waste Management Plan (EN.F.09) will outline procedures for the segregation, storage, and disposal of all waste streams, including general construction waste, hazardous materials, and contaminated soils.

- 6.8.2 Designated waste storage areas will be established on impermeable surfaces with appropriate bunding to prevent runoff and contamination of surrounding land or watercourses. All waste containers will be clearly labelled, secured, and emptied regularly to prevent accumulation and reduce environmental risks. Hazardous waste, such as fuels, chemicals, and contaminated materials, will be stored in compliance with relevant regulatory requirements and will be removed from the site by licensed waste contractors for proper disposal.
- 6.8.3 Where feasible, materials will be reused on-site, such as backfill or for landscaping purposes, provided that such reuse meets engineering and environmental specifications. All off-site waste movements will be fully documented, and records will be retained to create a transparent audit trail of waste management activities.
- 6.8.4 The contractor will conduct monitoring to ensure compliance with the Waste Management Plan and all statutory requirements.

6.9 Landscape and Ecology Design and Management

- 6.9.1 The landscape and ecological features of the site, which include dune systems, wet woodlands, ponds, and associated habitats adjacent to Kenfig Hill and Margam Moors SSSIs, will be managed according to the scheme's ecological objectives. All construction and post-construction activities will be conducted to minimise impacts on habitats and species. Specific protection measures will be implemented for the confirmed great crested newts in Pond 4, as well as for bats, reptiles, and the bird populations.
- 6.9.2 Reinstatement of disturbed areas will involve using locally appropriate species and planting mixes to maintain habitat connectivity and support the ecological integrity of the site. Sensitive habitats, such as wet woodlands and riparian zones along the Afon Cynffig, will be preserved whenever possible, with clearly defined buffer zones established to prevent accidental encroachment. Temporary protection measures, including fencing and exclusion zones, will be installed around priority ecological features during construction. Reptile populations will be safeguarded through staged clearance and translocation in accordance with the Reptile Method Statement, ensuring their safe relocation prior to any disturbance to their habitats.
- 6.9.3 The INNS Management Plan will guide the control and monitoring of invasive species throughout the construction and post-construction phases. Identified areas containing Japanese knotweed, Himalayan balsam, western skunk cabbage, montbretia, and cotoneaster will be appropriately treated, monitored, and managed to prevent further spread. Regular ecological monitoring will be conducted to assess the effectiveness of reinstatement and habitat management measures, with adaptive management applied as needed to address unforeseen ecological impacts or changes in site conditions.
- 6.9.4 All landscape and ecological management measures will be implemented under the supervision of the ECoW and the relevant statutory bodies. All work will comply with applicable legislation, including the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations, and the Invasive Alien Species (Enforcement and Permitting) Order 2019.

6.10 Public Rights of Way

- 6.10.1 Public Rights of Way (PRoW) that cross or are adjacent to the scheme will be managed to ensure public safety and continuity of access throughout the construction period. All affected routes will be clearly signposted, and temporary diversion paths will be provided when necessary to maintain connectivity. The construction team will work closely with the local authority to comply with relevant PRoW legislation and to obtain any required permissions for temporary closures or diversions.
- 6.10.2 Where construction activities occur near PRoWs, temporary protective fencing will be installed to separate the public from active work areas, equipment movements, and excavations. Clear signage will indicate safe pedestrian routes, provide information on diversion lengths and durations, and include contact details for reporting any queries or concerns. Any planned temporary closures will be communicated in advance to residents, community groups, and landowners to minimise inconvenience.
- 6.10.3 After the construction is completed, all PRoWs affected by the work will be restored to their original condition or enhanced as appropriate. Reinstatement will ensure that surface quality, drainage, and accessibility are maintained at or improved to pre-construction standards. Ongoing monitoring during and after construction will confirm that the reinstated PRoWs remain safe, accessible, and fully operational for public use.

6.11 Environmental Training

- 6.11.1 All personnel involved in construction works will receive appropriate environmental training to ensure they are aware of and comply with the environmental requirements of the scheme. The induction training will cover key topics, including site-specific ecological sensitivities, protection measures for designated sites, management of INNS, pollution prevention, and procedures for reporting environmental incidents.
- 6.11.2 Toolbox talks will be provided to personnel engaged in higher-risk activities, such as work near watercourses, protected species including GCN, reptiles, bats and INNS, habitats, or areas supporting reptiles, amphibians, or wet woodlands. Refresher training sessions will be held periodically throughout the construction phase to maintain awareness of environmental responsibilities and to communicate updates on procedures, legislation, or site conditions.
- 6.11.3 The Contractor will maintain all records and will make them available for inspection upon request. These records will include details of attendees, content, and any assessments or competency checks completed.

7 ENVIRONMENTAL MONITORING

7.1 Environmental Monitoring Procedures

- 7.1.1 Environmental monitoring will be conducted throughout the duration of the scheme to ensure compliance with environmental legislation, planning conditions, and all requirements set by NRW licensing. The monitoring will be led by the ECoW in close coordination with the Site Manager, with support from specialist contractors as needed.
- 7.1.2 This monitoring will confirm that all ecological, hydrological, and pollution-prevention measures are effective, safeguarding sensitive receptors, including the ponds, the Afon Cynffig, the rhyne system within Margam Moors, and the adjacent Kenfig Hill and Margam Moors SSSI, throughout construction.

General Environmental Monitoring

- 7.1.3 General environmental monitoring will involve regular inspections to ensure all control measures, such as sediment barriers, silt curtains, amphibian exclusion fencing, and fuel storage bunds, are functioning correctly. All data will be logged and any deviations or exceedances will trigger the environmental incident and corrective action procedure.

Water Quality Monitoring

- 7.1.4 Water quality monitoring will build on baseline sampling completed across the Afon Cynffig and the nearby rhyne system. Ongoing sampling during construction will monitor parameters including pH, turbidity, suspended solids, hydrocarbons, and nutrient levels. The frequency of monitoring will increase following heavy rainfall or during in-river works.

Ecological Monitoring

- 7.1.5 Ecological monitoring under NRW Licence S095886/1 (valid from October 30, 2025, to August 31, 2026) will ensure that amphibian exclusion fencing is inspected daily and repaired within 24 hours if damaged.
- 7.1.6 Ground temperature monitoring will be conducted using data loggers to assess hibernation and breeding conditions, ensuring that works are timed to avoid sensitive GCN activity periods.
- 7.1.7 Disturbance to GCN and other amphibians will be minimised, with all activities conducted in accordance with the approved method statement.
- 7.1.8 Biosecurity protocols will be implemented as per the Biosecurity Risk Assessment, ensuring that all equipment is cleaned before arriving and after leaving the site.
- 7.1.9 Cease-work procedures will be initiated immediately if higher numbers of GCN than licensed are encountered or if any other protected species are identified, pending NRW guidance or a licence variation.
- 7.1.10 Ecological compliance audits will be completed by August 31, 2026, and a final report submitted to NRW within four weeks of the completion of licensed works.

- 7.1.11 Habitat and species monitoring will include regular checks for bats, reptiles, and nesting birds conducted by the ECoW before and during construction. Any changes to site conditions or species presence will be recorded and reported to the ECoW.

INNS Monitoring

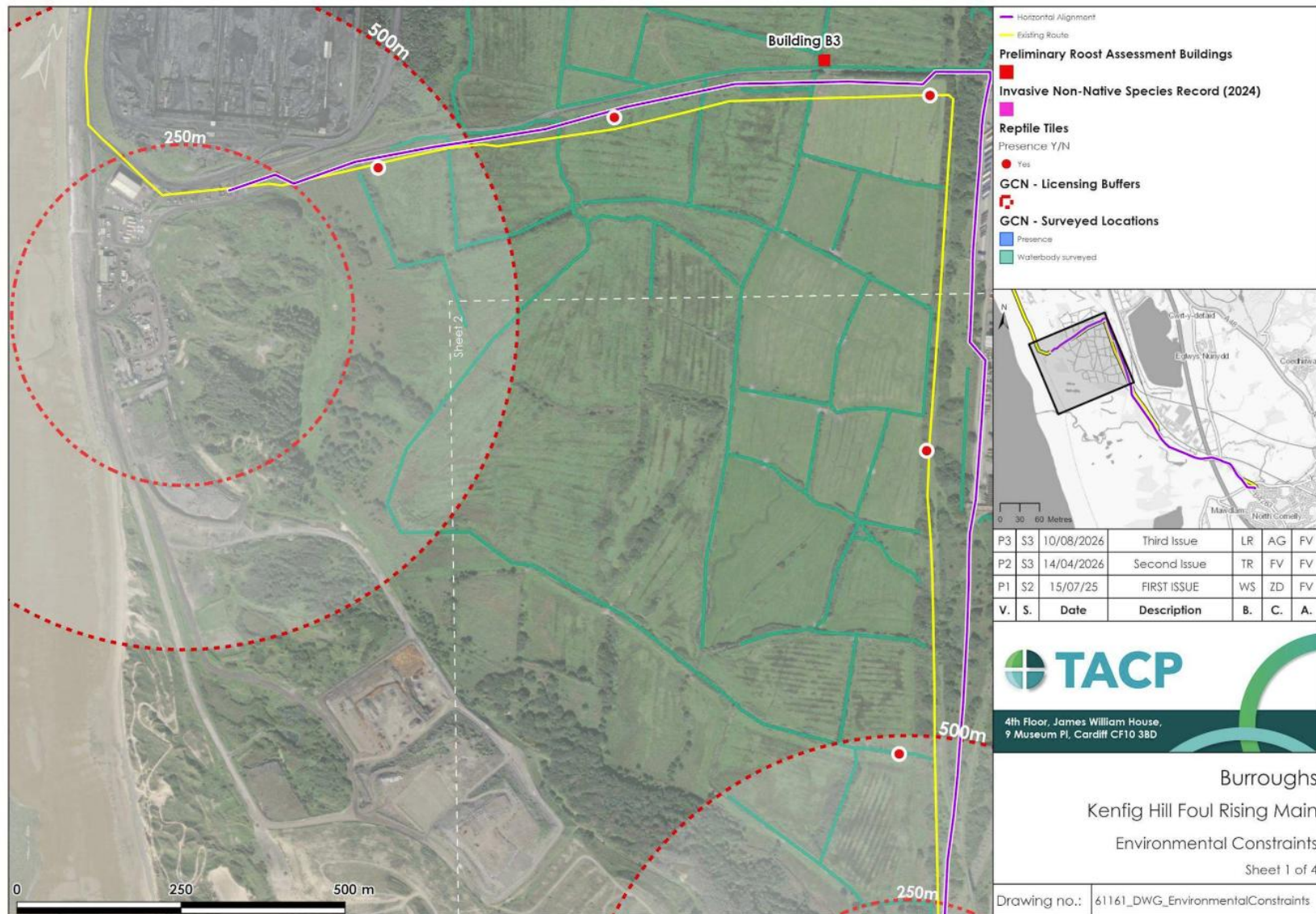
- 7.1.12 Invasive Non-Native Species monitoring will involve monthly inspections during the growth season in work areas affected by Japanese knotweed, Himalayan balsam, Himalayan cotoneaster, wall cotoneaster, Montbretia, and Western skunk cabbage. These inspections will ensure that no spread of invasive species occurs as a result of works in the area, in compliance with the Invasive Alien Species (Enforcement and Permitting) Order 2019 and the Wildlife and Countryside Act 1981 (as amended). Full management and control measures are outlined in the INNS Management Plan, which all site operatives must follow.

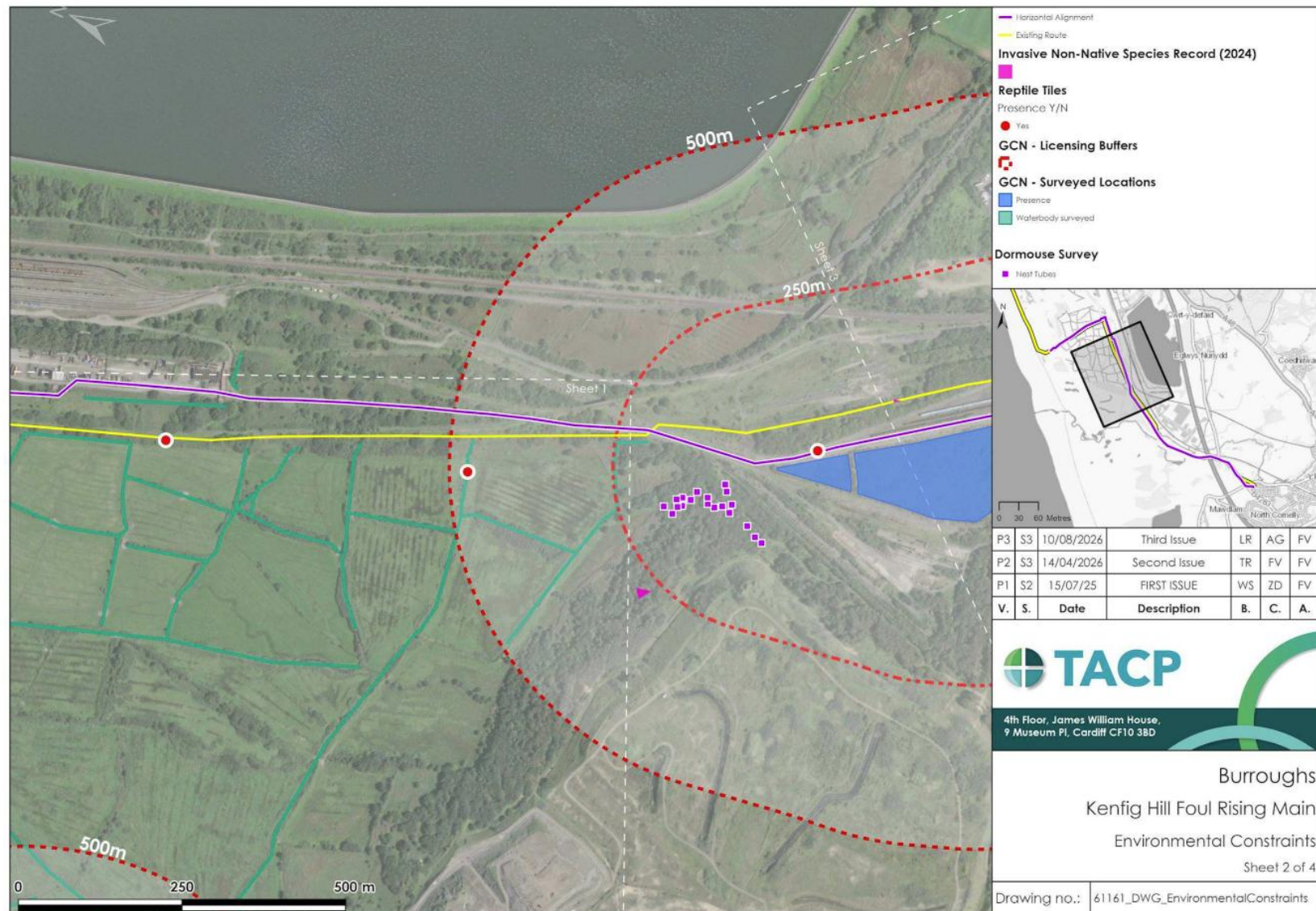
8 REFERENCES

APPENDICES

Appendix A

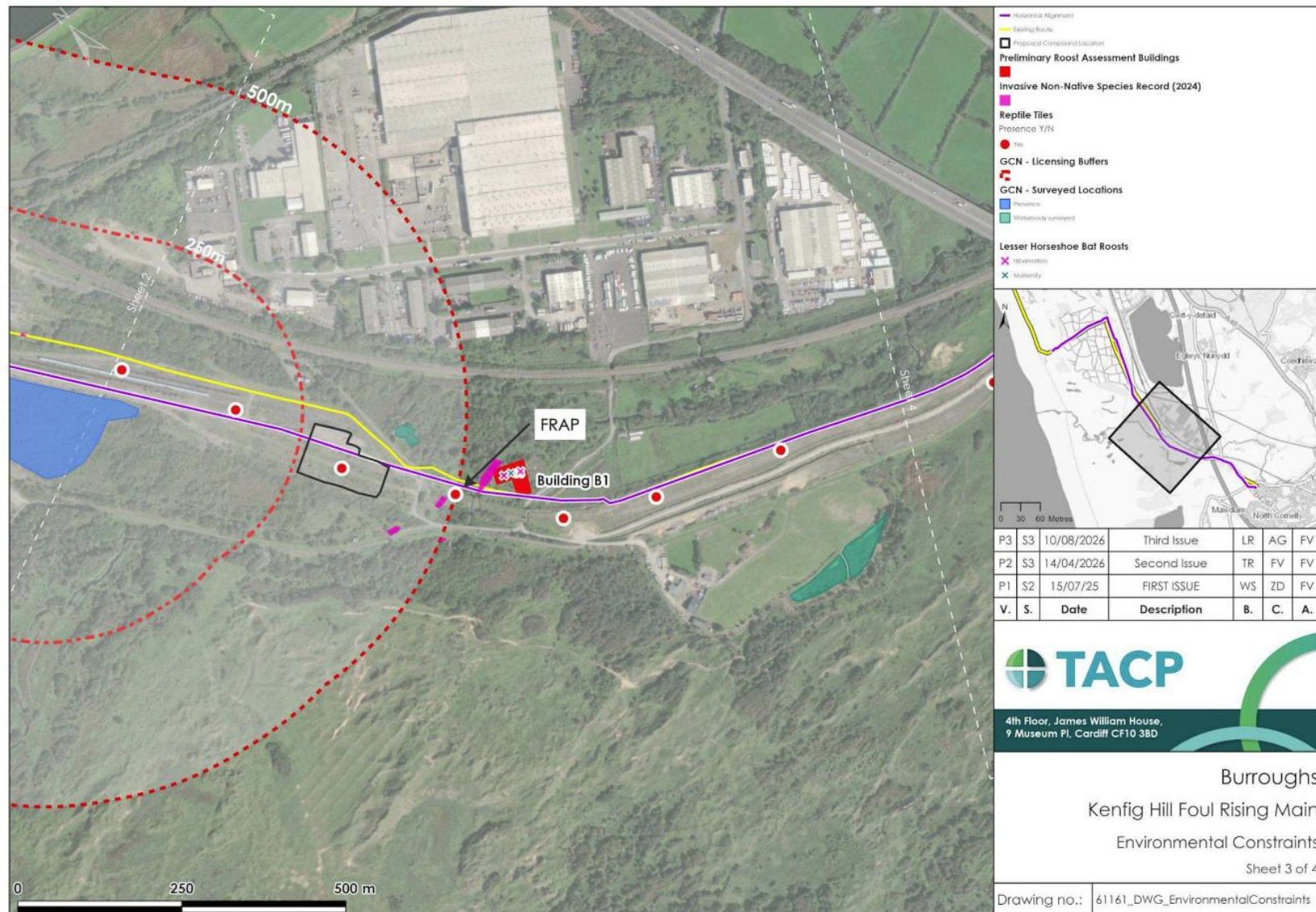
Ecological Constraints

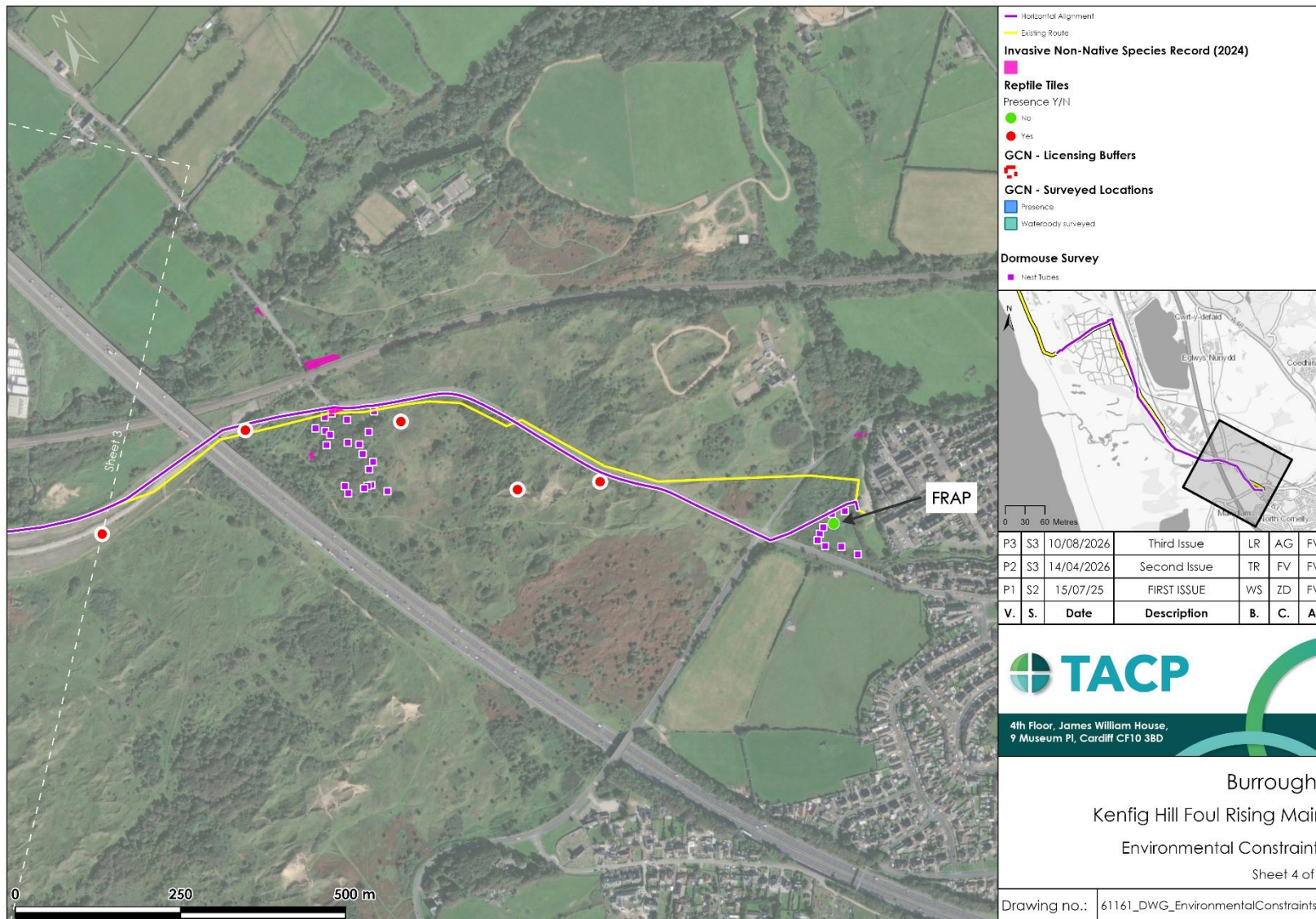




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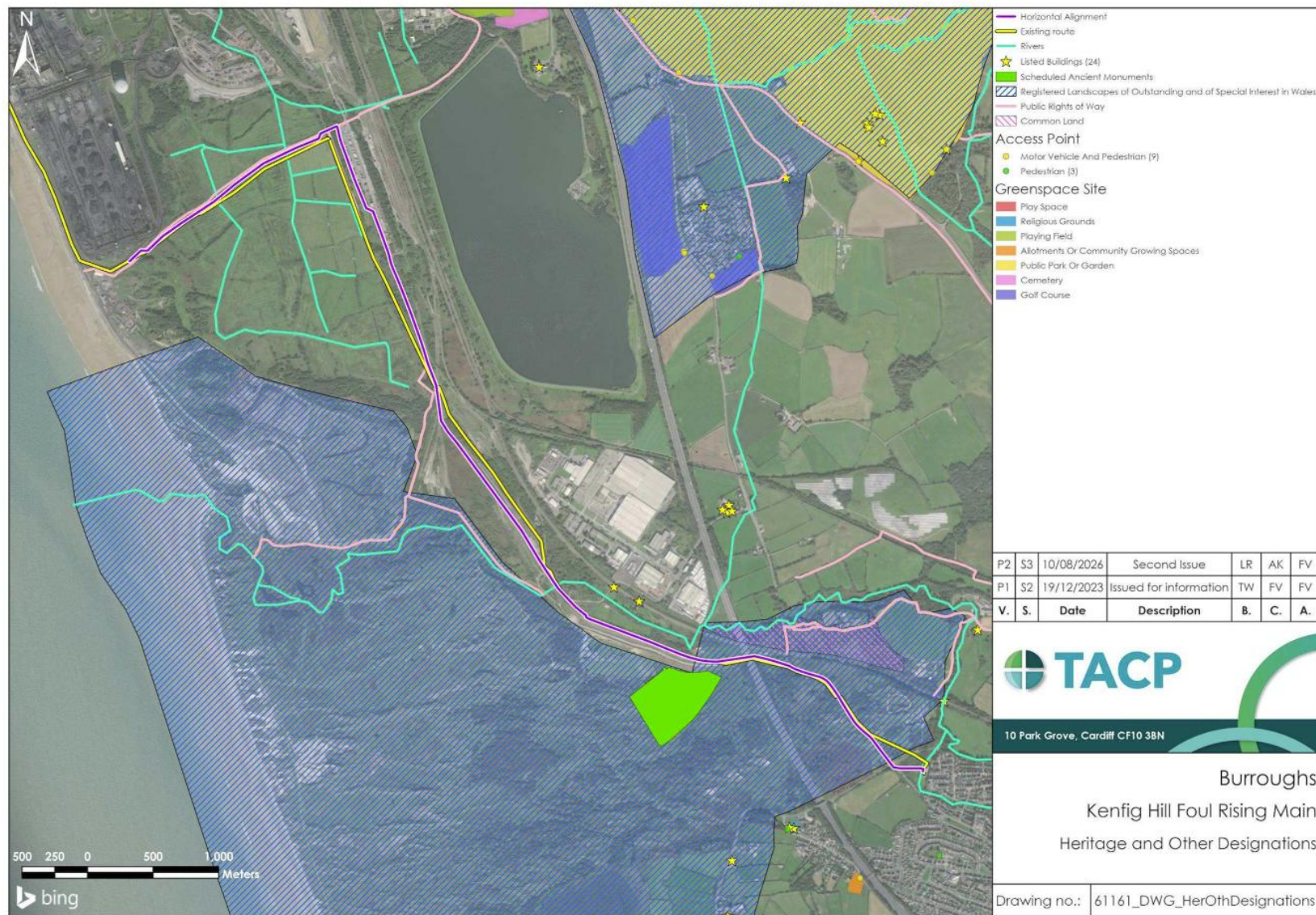




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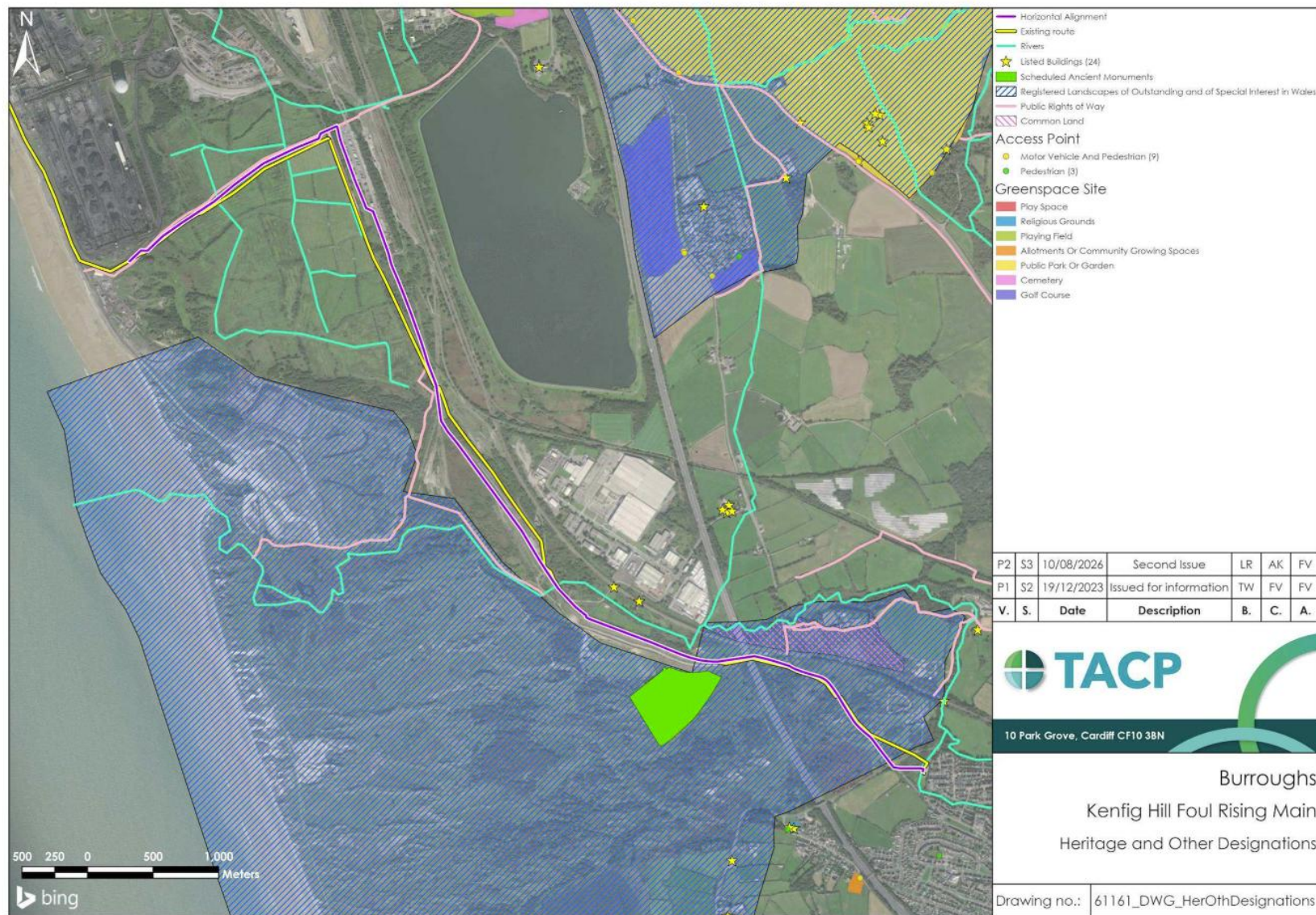
Appendix B

Environmental Designations



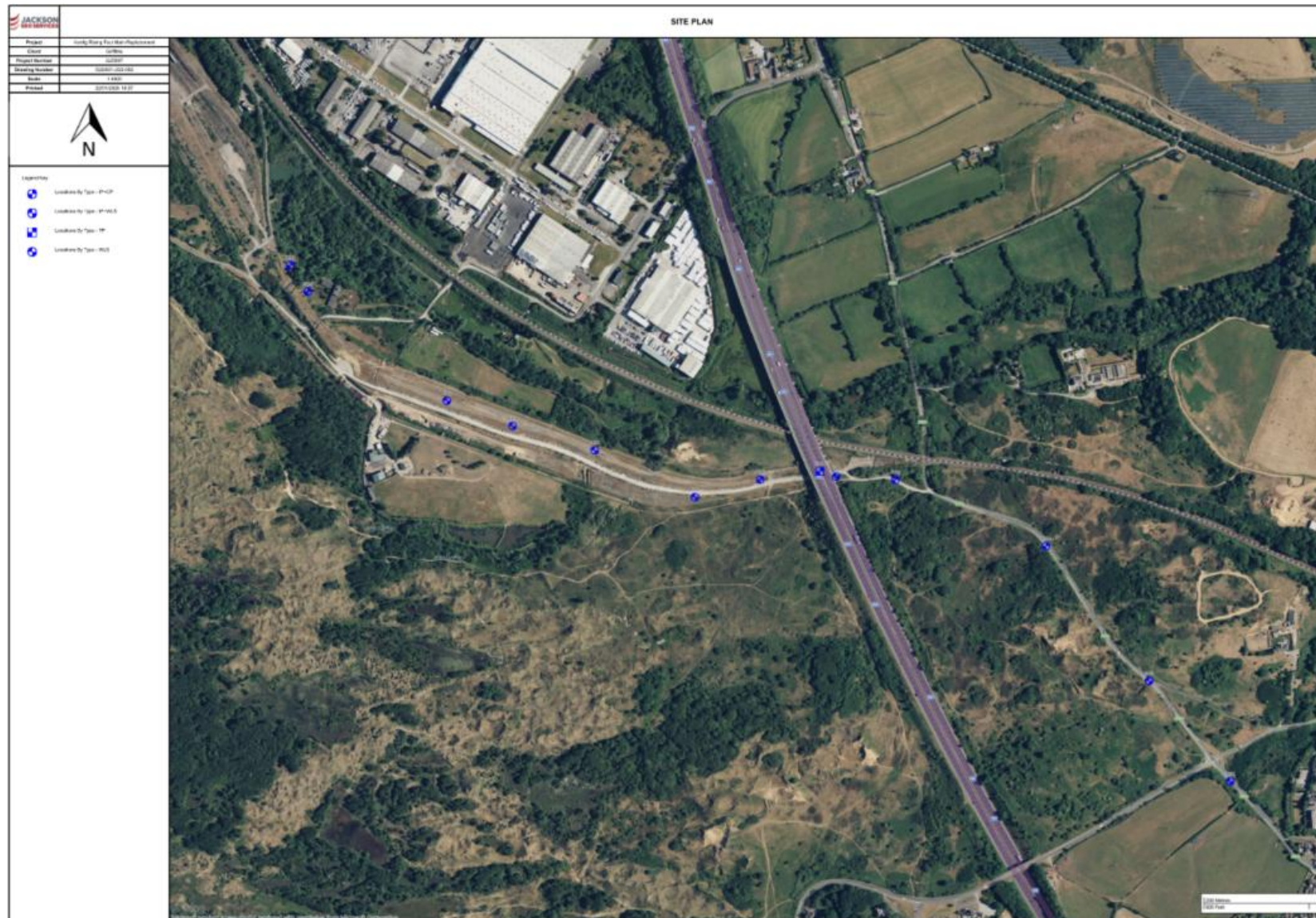
Appendix C

Heritage and Other Designations



Appendix D

Exploratory Hole Plan





Appendix E

Waste Classification Report



Marlas SPS Rising
Main Factual Report.p



Waste Classification Report

HazWasteOnline™ classifies waste as either **hazardous** or **non-hazardous** based on its chemical composition, related legislation and the rules and data defined in the current UK or EU technical guidance (Appendix C) (note that HP 9 Infectious is not assessed). It is the responsibility of the classifier named below to:

- understand the origin of the waste
- select the correct List of Waste code(s)
- confirm that the list of **detectable** results and sampling plan are fit for purpose
- select and justify the chosen metal species (Appendix B)
- correctly apply moisture correction and other available corrections
- add the meta data for their user-defined substances (Appendix A)
- check that the classification engine is suitable with respect to the national destination of the waste (Appendix C)



1HEC9-1DQD7-11LUW

To aid the reviewer, the laboratory results, assumptions and justifications managed by the classifier are highlighted in **pale yellow**.

Report is invalid if pages are removed.

Job name

G25097

Description/Comments

Project

G25097

Site

Marlas

Classified by

Name: **Adam Putt**
Date: **29 Jan 2026 18:08 GMT**
Telephone: **02920 088788**
Company: **Jackson Geo Services**
Unit B3 Fram Enterprise Centre Parc
Burgess Edwards
Pontyolun
CF728QZ

HazWasteOnline™ provides a **quality** hazardous waste classification course that covers the use of the software and both basic and advanced waste classification techniques. Certification **has to** be renewed every 3 years.

HazWasteOnline™ Certification:	CERTIFIED
Course	Date
Hazardous Waste Classification	04 Feb 2021
Most recent 3 year Refresher	06 Feb 2024

Next **3 year** Refresher due by Feb 2027

Purpose of classification

2 - Material Characterisation

Address of the waste

Marlas New Pipe Run

Post Code SA13 2PE

SIC for the process giving rise to the waste

42910 Construction of water projects

Description of Industry/producer giving rise to the waste

Construction of new Dwr Cymru pipe

Description of the specific process, sub-process and/or activity that created the waste

Open cut excavation for Dwr Cymru pipe

Description of the waste

Soil and stones

8.1.2

Appendix F

FRAP

Appendix G

SSSI Assent