

Statement of Agricultural Benefit

– Clyn yr Ynys, Towyn Farm, Nant y Croi Farm & Hafod Farm



Applicant: Mr Daniel James and Mrs Carys James (Stepside Agricultural Contractors)

Permit: SR2010 No4: mobile plant for land-spreading

Permit number: EPR/AB3891CX

Agricultural benefit statement is prepared by:

Mr Robert Tucker

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This agricultural benefit statement has been prepared based on information provided by Stepside Agricultural Contractors. It is made on the understanding that all information provided is correct and representative of the fields to which the material is to be applied and of the waste material to be applied.

Farm addresses:

Clyn yr Ynys, Gwbert, Cardigan, Ceredigion, SA43 1PR

Towyn Farm, Gwbert, Cardigan, Ceredigion, SA43 1PR

Nant y Croi Farm, Ferwig, Cardigan, Ceredigion, SA43 1PU

Hafod Farm, Ferwig, Cardigan, Ceredigion, SA43 1PU

Wastes to be applied:

Waste Code	Waste Description	Physical Form	Waste Producer
19 09 02	Sludge from water clarification	Sludge cake (stackable)	Dwr Cymru Welsh Water Bolton Hill WTW
19 09 02	Sludge from water clarification	Sludge cake (stackable)	Dwr Cymru Welsh Water Preseli WTW
19 09 02	Sludge from water clarification	Sludge cake (stackable)	Dwr Cymru Welsh Water Llechryd WTW
19 09 02	Sludge from water clarification	Sludge cake (stackable)	Dwr Cymru Welsh Water Strata Florida WTW
19 09 02	Sludge from water clarification	Sludge cake (stackable)	Dwr Cymru Welsh Water Bontgoch WTW
19 09 02	Sludge from water clarification	Liquid sludge	Dwr Cymru Welsh Water Bolton Hill WTW
19 09 02	Sludge from water clarification	Liquid sludge	Dwr Cymru Welsh Water Preseli WTW
19 09 02	Sludge from water clarification	Liquid sludge	Dwr Cymru Welsh Water Llechryd WTW
19 09 02	Sludge from water clarification	Liquid sludge	Dwr Cymru Welsh Water Strata Florida WTW
19 09 02	Sludge from water clarification	Liquid sludge	Dwr Cymru Welsh Water Bontgoch WTW

Application:

- Fields Hafod 5928, Nant y Croi 10 & Hafod 2675 will be spread in March – April 2026 prior to first cut silage. Field 5928 will be spread with sludge cake, or with an application of liquid sludge up to 50t/ha. Fields Nant y Croi 10 & Hafod 2675 will only be spread with liquid sludge. Field Hafod 5928 will then be spread again with sludge cake, or liquid sludge & fields Nant y Croi 10 & Hafod 2675 only with liquid sludge in May - June 2026 and following further silage cuts July – September 2026. Spreading of these grass fields may be split into up to 5 separate applications for liquid sludge & the total of all applications will not exceed the max application rate for each field as listed in table 1. For liquid sludge each individual application will not exceed 50t/ha in any one application to a field and individual applications will be at least 3 weeks apart. For sludge cake spread on field Hafod 5928, spreading may be split into 2 separate applications.
- Fields Hafod 5505, Hafod 9875, CYY 7065, CYY 2074 & Hafod 0834 will be spread with sludge cake, or with an application of liquid sludge up to 50t/ha prior to cultivations and planting of the spring wheat crops in March – May 2026. The fields will then be spread again with liquid sludge with up to 2 applications at least 3 weeks apart and up to 50t/ha per application into the growing crops in April – June 2026. The waste will be soil incorporated as soon as possible and within 24 hours where spread prior to cultivations and planting of the spring wheat crops.
- Field Hafod 3370 will be spread with sludge cake, or with an application of liquid sludge up to 50t/ha prior to cultivations and planting of the forage maize crop in April – June 2026. The field will then be spread again with liquid sludge with up to 2 applications at least 3 weeks apart and up to 50t/ha per application into the growing crop in May – June 2026. The waste will be soil incorporated as soon as possible and within 24 hours where spread prior to cultivations and planting of the forage maize crop.
- Spreading of the waste will be carried out in accordance with the Code of Good Agricultural Practice, The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 and in accordance with the requirements of the deployment and Environmental Permitting Regulations.
- NRW will be informed at least 48 hours prior to any spreading commencing and no spreading will occur within 48 hours of forecasted heavy rainfall.
- Liquid sludge will be discharged into a temporary storage nurse tank ('holding tank') prior to spreading. Liquid sludge is spread from the nurse tank onto the deployed fields at the required timings as stated above. This is done by either umbilical method with the liquid delivered to tractor in deployed fields pumped through hose and spread by dribble bar applicator mounted onto the back of the tractor, or a tractor and vacuum tanker with dribble bar applicator.
- Should the ground or weather conditions mean it's unsuitable for spreading then temporary storage of liquid sludge in a nurse tank may be required. These potential locations are detailed on the attached field maps & within the LPD1 form.
- The nurse tanks do not have secondary containment but are impermeable purpose-built AW Trailers alloy nurse tanks featuring internal bracing, an anti-corrosive interior coating, designated fill and empty valves that can be shut by gate valves. These valves can be locked off in the event of temporary overnight temporary storage if the tank contains liquid to ensure secure temporary storage. The tanks are only for temporary storage and are normally rarely in use other than just prior to or when spreading activity is being undertaken. In most cases the nurse tanks are unlikely to contain liquid overnight. The tanks fill from the top via internal pipework with a 'swanneck' reducing chances off any spills when decoupling connecting pipes after filling. The empty valve allows the tanks to be completely emptied to the bottom. The tanks are sealed with roof to prevent rainwater entering the tank and for safety, and can be vented if required. A hydraulic lifting axle in the middle allows the tanks to positioned and lowered, then locked into position so the whole tank is on the ground.
- The nurse tanks will be completely empty before use. Only liquid sludges as specified in this deployment will be stored in the nurse tanks.
- For liquid sludges the maximum application rate in Table 1 for each field will be split into multiple applications. Each individual application will not exceed 50t/ha in any one application to a field.
- The stackable water clarification sludge cakes are delivered to the spreading fields and stockpiled in temporary field heaps prior to spreading. Spreading of the sludge cakes is undertaken with rear discharge muck spreaders.
- The liquid water clarification sludges and sludge cake may be applied separately or both to the same field in separate applications.
- When multiple liquid water clarification sludges or sludge cakes are applied to the same field in separate applications the maximum application rates will be set so that for the total combined amount applied the total nitrogen loading will be less than 250 kg/ha, and the amount of available nitrogen and total or available phosphate and potash (whichever is appropriate) will not exceed the fertiliser recommendation or the amount removed in crop offtake (as listed in Table 1), whichever is the greater, and PTEs applied will remain below annual addition limits.
- The maximum application rates for each field listed in Table 1 apply to an individual waste being applied solely to a field and have been made on a field by field basis using The Nutrient Management Guide (RB209).

Benefits from waste application:

- The analysis and nutrient content of the wastes are shown in the waste analysis attachments.
- The wastes are a source of nitrogen, phosphate, potassium, sulphur and organic matter. The wastes can be beneficially used to replace a proportion of bagged mineral fertiliser.
- The risk of sulphur deficiency has been estimated as 'High' based on the soil texture and expected winter rainfall (RB209). The crop requirements are 25-120kg SO₃/ha. The amount of available sulphur supplied by the wastes at the proposed maximum application rates is 2-20kg SO₃/ha.
- The addition of organic matter to the soil will help improve soil structural stability, biological activity, water and nutrient holding capacity i.e. resistance to drought, and reduction of localised flooding, reduced leaching of nutrients, and improved workability in soil.

Materials applied in previous 12 months:

The fields within this deployment application have received the rates (t/ha) of materials as in 'Table 4 - Previous Land Treatment' within the previous 12 months.

It's considered that the nutrients applied from these applications were for the requirements of previous crops before the material within this deployment is applied for future crops.

Nutrients supplied by this application:

The maximum application rates of each of the DCWW liquid water clarification sludges & water clarification sludge cakes applied on their own to a field are shown in Table 1 and are listed below:

Rates of application (t/ha)	Nitrogen kg/ha		Phosphate (P ₂ O ₅) kg/ha		Potash (K ₂ O) kg/ha		Magnesium (MgO) kg/ha		Sulphur (SO ₃) kg/ha	
	Total	Available	Total	Available	Total	Available	Total	Available	Total	Available
DCWW Bolton Hill WTW sludge cake @ 41 t/ha	81	8	50	10	4	1	8	2	82	8
DCWW Bolton Hill WTW sludge cake @ 50 t/ha	99	10	61	12	5	1	9	2	100	10
DCWW Preseli WTW sludge cake @ 67 t/ha	107	11	17	3	2	0	6	1	196	20
DCWW Llechryd WTW sludge cake @ 28 t/ha	59	6	49	10	2	0	8	2	46	5
DCWW Llechryd WTW sludge cake @ 35 t/ha	74	7	62	12	2	0	10	2	58	6
DCWW Llechryd WTW sludge cake @ 45 t/ha	95	10	79	16	3	1	13	3	74	7
DCWW Strata Florida WTW sludge cake @ 50 t/ha	105	10	39	8	2	0	4	1	103	10
DCWW Strata Florida WTW sludge cake @ 64 t/ha	134	13	50	10	2	0	5	1	132	13
DCWW Strata Florida WTW sludge cake @ 79 t/ha	165	17	62	12	3	1	6	1	163	16
DCWW Bontgoch WTW sludge cake @ 15 t/ha	44	4	50	10	1	0	4	1	26	3
DCWW Bontgoch WTW sludge cake @ 19 t/ha	55	6	63	13	1	0	4	1	32	3
DCWW Bontgoch WTW sludge cake @ 24 t/ha	70	7	79	16	1	0	6	1	41	4
Estimated Availability	10%		20%		20%		20%		10%	

Nutrients supplied by this application (continued):

Rates of application (t/ha)	Nitrogen kg/ha		Phosphate (P ₂ O ₅) kg/ha		Potash (K ₂ O) kg/ha		Magnesium (MgO) kg/ha		Sulphur (SO ₃) kg/ha	
	Total	Available	Total	Available	Total	Available	Total	Available	Total	Available
DCWW Bolton Hill WTW liquid sludge @ 150 t/ha	61	6	40	8	5	1	12	2	77	8
DCWW Bolton Hill WTW liquid sludge @ 250 t/ha	101	10	66	13	9	2	21	4	128	13
DCWW Preseli WTW liquid sludge @ 150 t/ha	44	4	6	1	1	0	2	0	88	9
DCWW Preseli WTW liquid sludge @ 250 t/ha	74	7	11	2	1	0	4	1	147	15
DCWW Llechryd WTW liquid sludge @ 89 t/ha	58	6	51	10	2	0	8	2	48	5
DCWW Llechryd WTW liquid sludge @ 110 t/ha	71	7	63	13	3	1	10	2	60	6
DCWW Llechryd WTW liquid sludge @ 140 t/ha	91	9	80	16	3	1	12	2	76	8
DCWW Strata Florida WTW liquid sludge @ 150 t/ha	60	6	16	3	1	0	2	0	47	5
DCWW Strata Florida WTW liquid sludge @ 250 t/ha	99	10	27	5	2	0	3	1	78	8
DCWW Bontgoch WTW liquid sludge @ 61 t/ha	40	4	51	10	0	0	4	1	19	2
DCWW Bontgoch WTW liquid sludge @ 75 t/ha	50	5	63	13	0	0	4	1	24	2
DCWW Bontgoch WTW liquid sludge @ 95 t/ha	63	6	79	16	0	0	6	1	30	3
Estimated Availability	10%		20%		20%		20%		10%	

Application of multiple wastes to the same field:

When multiple liquid water clarification sludges or sludge cakes are applied to the same field in separate applications the maximum application rates will be set so that for the total combined amount applied the total nitrogen loading will be less than 250 kg/ha, and the amount of available nitrogen and total or available phosphate and potash (whichever is appropriate) will not exceed the fertiliser recommendation or the amount removed in crop offtake (as listed in Table 1), whichever is the greater, and PTEs applied will remain below annual addition limits.

The following example shows the maximum rate of application and nutrient content where 50 t/ha DCWW Bontgoch WTW liquid water clarification sludge and 25 t/ha Llechryd WTW liquid water clarification sludge are both spread on a field in separate applications.

(No more than 50 t/ha of liquid water clarification sludge spread in a single application and applications at least 3 weeks apart)

Example:

	Rate of application (t/ha)	Nitrogen kg/ha		Phosphate (P ₂ O ₅) kg/ha		Potash (K ₂ O) kg/ha		Magnesium (MgO) kg/ha		Sulphur (SO ₃) kg/ha	
		Total	Available	Total	Available	Total	Available	Total	Available	Total	Available
DCWW Bontgoch WTW liquid sludge	50	33	3	42	8	0	0	3	1	16	2
DCWW Llechryd WTW liquid sludge	25	16	2	14	3	1	0	2	0	14	1
TOTAL	75	49	5	56	11	1	0	5	1	30	3

Table 1: Field, Soil & Cropping Details, Fertiliser Recommendations and Application Rates

Field Ref.	Soil Type	Spreadable Area (ha)	Previous Crop	Next Crop	Nitrogen		Phosphate			Potash			Magnesium	
					SNS	N Required (kg/ha)	P Index	P ₂ O ₅ Required (kg/ha)	Crop Use (Offtake) (kg/ha)	K Index	K ₂ O Required (kg/ha)	Crop Use (Offtake) (kg/ha)	Mg Index	MgO Required (kg/ha)
Clyn yr Ynys														
Hafod 5505	Medium soils	3.30	Stubble turnips / forage rape	Spring wheat	1	180	3	0	51	1	100	72	2	0
Hafod 9875	Medium soils	7.80	Stubble turnips / forage rape	Spring wheat	1	180	3	0	51	1	100	72	1	0
CY 7065	Medium soils	4.30	Stubble turnips / forage rape	Spring wheat	1	180	3	0	51	1	100	72	2	0
CY 2074	Medium soils	5.00	Stubble turnips / forage rape	Spring wheat	1	180	2	50	51	1	100	72	2	0
Towyn Farm														
Hafod 0834	Medium soils	5.30	Stubble turnips / forage rape	Spring wheat	1	180	2	50	51	1	100	72	2	0
Hafod 5928	Medium soils	7.40	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	3	20	80	1	320	282	1	0
Hafod 3370	Medium soils	4.70	Stubble turnips / forage rape	Forage maize	1	100	3	20	63	1	227	198	2	0
Nant y Croi Farm														
Nant y Croi 10	Medium soils	3.70	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	2	80	80	1	320	282	3	0
Hafod Farm														
Hafod 2675	Medium soils	5.00	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	2	80	80	2-	280	282	3	0
TOTAL		46.50												

Nutrient requirements based on:
 Spring wheat 6t/ha straw removed
 Forage maize 45t FW/ha silage (30% DM)
 Grass 3 cuts silage (23t FW/ha at 1st cut, 15t FW/ha at 2nd cut, 9t FW/ha at 3rd cut), silage 25% DM, totalling 1.7kg/t P2O5 and 6.0kg/t K2O removed in offtake. Expected DM yields of grass 9-12t/ha, good growth class

Field Ref.	Dwr Cymru Welsh Water Bolton Hill WTW - water clarification sludge cake						Dwr Cymru Welsh Water Preseli WTW - water clarification sludge cake						Dwr Cymru Welsh Water Llechryd WTW - water clarification sludge cake					
	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes
Clyn yr Ynys																		
Hafod 5505	**8	*50	**1	*8	41	135	**11	*17	**0	*6	67	221	**6	*49	**0	*8	28	92
Hafod 9875	**8	*50	**1	**2	41	320	**11	*17	**0	**1	67	523	**6	*49	**0	**2	28	218
CY 7065	**8	*50	**1	*8	41	176	**11	*17	**0	*6	67	288	**6	*49	**0	*8	28	120
CY 2074	**8	*50	**1	*8	41	205	**11	*17	**0	*6	67	335	**6	*49	**0	*8	28	140
Towyn Farm																		
Hafod 0834	**8	*50	**1	*8	41	217	**11	*17	**0	*6	67	355	**6	*49	**0	*8	28	148
Hafod 5928	**10	*61	**1	**2	50	370	**11	*17	**0	**1	67	496	**10	*79	**1	**3	45	333
Hafod 3370	**10	*61	**1	*9	50	235	**11	*17	**0	*6	67	315	**7	*62	**0	*10	35	165
Nant y Croi Farm																		
Nant y Croi 10					0	0					0							0
Hafod Farm																		
Hafod 2675					0	0					0							0
TOTAL						1658						2533						1216

Field Ref.	Dwr Cymru Welsh Water Strata Florida WTW - water clarification sludge cake						Dwr Cymru Welsh Water Bontgoch WTW - water clarification sludge cake						Dwr Cymru Welsh Water Bolton Hill WTW - liquid water clarification sludge					
	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes
Clyn yr Ynys																		
Hafod 5505	**13	*50	**0	*5	64	211	**4	*50	**0	*4	15	49	**6	*40	**1	*12	150	495
Hafod 9875	**13	*50	**0	**1	64	499	**4	*50	**0	**1	15	117	**6	*40	**1	**2	150	1170
CY 7065	**13	*50	**0	*5	64	275	**4	*50	**0	*4	15	64	**6	*40	**1	*12	150	645
CY 2074	**13	*50	**0	*5	64	320	**4	*50	**0	*4	15	75	**6	*40	**1	*12	150	750
Towyn Farm																		
Hafod 0834	**13	*50	**0	*5	64	339	**4	*50	**0	*4	15	80	**6	*40	**1	*12	150	795
Hafod 5928	**10	*39	**0	**1	50	370	**7	*79	**0	**1	24	178	**10	*66	**2	**4	250	1850
Hafod 3370	**17	*62	**1	*6	79	371	**6	*63	**0	*4	19	89	**6	*40	**1	*12	150	705
Nant y Croi Farm																		
Nant y Croi 10					0	0					0							0
Hafod Farm																		
Hafod 2675					0	0					0							0
TOTAL						2385						652						6410

Field Ref.	Dwr Cymru Welsh Water Preseli WTW - liquid water clarification sludge						Dwr Cymru Welsh Water Llechryd WTW - liquid water clarification sludge						Dwr Cymru Welsh Water Strata Florida WTW - liquid water clarification sludge					
	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes
Clyn yr Ynys																		
Hafod 5505	**4	*6	**0	*2	150	495	**6	*51	**0	*8	89	293	**6	*16	**0	*2	150	495
Hafod 9875	**4	*6	**0	**0	150	1170	**6	*51	**0	**2	89	694	**6	*16	**0	**0	150	1170
CY 7065	**4	*6	**0	*2	150	645	**6	*51	**0	*8	89	383	**6	*16	**0	*2	150	645
CY 2074	**4	*6	**0	*2	150	750	**6	*51	**0	*8	89	445	**6	*16	**0	*2	150	750
Towyn Farm																		
Hafod 0834	**4	*6	**0	*2	150	795	**6	*51	**0	*8	89	472	**6	*16	**0	*2	150	795
Hafod 5928	**7	*11	**0	**1	250	1850	**9	*80	**1	**2	140	1036	**10	*27	**0	**1	250	1850
Hafod 3370	**4	*6	**0	*2	150	705	**7	*63	**1	*10	110	517	**6	*16	**0	*2	150	705
Nant y Croi Farm																		
Nant y Croi 10						0	**9	*80	**1	*12	140	518						0
Hafod Farm																		
Hafod 2675						0	**9	*80	**1	*12	140	700						0
TOTAL						6410						5058						6410

Dwr Cymru Welsh Water Bontgoch WTW - liquid water clarification sludge						
Field Ref.	N Applied - Waste (kg/ha)	P ₂ O ₅ Applied - Waste (kg/ha)	K ₂ O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes
Clyn yr Ynys						
Hafod 5505	**4	*51	**0	*4	61	201
Hafod 9875	**4	*51	**0	**1	61	476
CY 7065	**4	*51	**0	*4	61	262
CY 2074	**4	*51	**0	*4	61	305
Towyn Farm						
Hafod 0834	**4	*51	**0	*4	61	323
Hafod 5928	**6	*79	**0	**1	95	703
Hafod 3370	**5	*63	**0	*4	75	353
Nant y Croi Farm						
Nant y Croi 10	**6	*79	**0	*6	95	352
Hafod Farm						
Hafod 2675	**6	*79	**0	*6	95	475
TOTAL						3450

* Total nutrient content of waste used on P, K or Mg index 2 or above

** Available nutrient content of waste used on P, K or Mg index 0 or 1

The assumed availability of total nutrients in the DCWW water clarification sludges are N 10%, P₂O₅ 20%, K₂O 20%, MgO 20%, SO₃ 10%

Potential negative impacts from this application and mitigation measures planned:

Waste composition & receiving soils

- Potentially Toxic Elements: The supplied concentrations at the proposed application rates are all lower than the maximum permissible levels detailed in the Sludge (Use in Agriculture) Regulations for biosolids applied to agricultural land, which is believed to be a suitable comparison for wastes applied to agricultural land.
- Physical contaminants: The wastes are produced by managed processes. The wastes do not contain physical contaminants.
- Dwr Cymru Welsh Water Llechryd & Bontgoch water treatment works use iron-based coagulants to condition the water. The sludges will only be spread on fields with a soil pH of 5.5 or above.
- Dwr Cymru Welsh Water Bolton Hill, Preseli & Strata Florida water treatment works use aluminium-based coagulants to condition the water. The sludges will only be spread on fields with a soil pH of 6.0 or above.
- The pH of the receiving soils ranges from pH 5.7 to 6.4.
- Fields Nant y Croi 10 and Hafod 2675 have soil pHs of 5.8 and 5.7 and as such no Bolton Hill, Preseli & Strata Florida water treatment works liquid sludges or sludge cakes will be spread on these fields.
- Soils have been sampled to 7.5cm for permanent grass fields, and to 15cm depth for temporary grass & arable fields with a 'half cheese' corer soil sampler walking a 'W' pattern across each field collecting approx. 25 sub samples per field.
- Receiving soils have been analysed and are suitable for application at the proposed application rates.

Operations

The fields in this deployment have been designated as 'high risk' following site checks on the proximity to surrounding protected areas (e.g. SSSIs) and groundwater source protection zones. On the basis of 'high risk' the proposed operation will be subject to a site-specific risk assessment for deploying mobile plant under a SR2010 No.4. The potential risks associated with the application of waste on this deployment have been identified as;

- Potential run-off after application: The wastes will be applied following the Code of Good Agricultural Practice. The maximum application rate for each field over 50t/ha where spread with liquid sludges will be split into multiple applications and will not exceed 50t/ha in any one application to a field. The fields will be spread using precision spreading dribble bar equipment for liquid sludges and with rear discharge muck spreaders for sludge cake, with no spreading areas enforced as per maps.
- All handling of the wastes will be in accordance to current regulations and relevant mitigation strategies will be adopted.
- The Dwr Cymru Welsh Water liquid water clarification sludges and water clarification sludge cake are considered to have no noticeable odour.
- Spillages: all spillages will be reported immediately to NRW.
- No waste will be spread within 10m of any ditch, pond or surface water, within 50m of any spring, well, borehole, or reservoir that supplies water for human consumption or farm dairies.
- Liquid sludges will be spread on delivery or temporarily securely stored as stated above. The water clarification sludge cakes will be stockpiled in field heaps prior to being spread.
- Operators will aim to empty spreading equipment before the end of each working day to avoid overnight storage of waste in machinery.
- Regular servicing of all machinery is conducted and spreading equipment is annually calibrated. To prevent waste being held in faulty machinery replacement spreading equipment will be available.
- Spreading machinery will travel over the field in a direction which will most easily allow the machinery to turn within the boundaries of the field. Spreading equipment will be turned off prior to turning at the end of each run.

- Machinery turns will be routed to avoid rutting and wheel slip. The turns will not be executed on any buffer strips.
- There will be sufficient trained staff available to ensure that the operation continues throughout operational hours (i.e. there will be sufficient cover for illness, holiday etc.).
- Rights of way have been marked on the spread risk maps. There is a public right of way in field CYY 2074 which has a 2 metres no spread buffer.
- Weather conditions will be monitored prior to spreading with wind speed and direction assessed.
- Consideration for the public and local residential receptors will be taken into account.

Signed: Robert Tucker

Date: 11/08/2025