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consulting

# **Natural Resources Wales**

## **Llanelltyd Sheet Pile Project**

### **Environmental Action Plan**

<b>Project name</b>	Llanelltyd Sheet Pile Removal Project
<b>Project code</b>	CE0974
<b>Area</b>	Llanelltyd
<b>Date</b>	March, 2026
<b>Version number</b>	P01
<b>Author</b>	Gemma Aubrey, JBA Consulting

### Revision history

<b>Revision date</b>	<b>Summary of changes</b>	<b>Author</b>	<b>Version number</b>
12/03/2026	-	Gemma Aubrey	P01

### EAP Approvals

<b>Name</b>	<b>Signature</b>	<b>Title</b>	<b>Date</b>	<b>Version</b>
Rachel Drabble		Principal Environmental Consultant	12/03/2026	P01

### Distribution

<b>Name</b>	<b>Title</b>	<b>Date</b>	<b>Version</b>

## Purpose

This Environmental Action Plan (EAP) summarises the actions required to implement the environmental mitigation for **the removal of a 30m section of failed sheet piling on the Afon Mawddach downstream of Dogellau, Gwynedd**. It sets out specific objectives and actions defining the way in which we which environmental risks should be minimised. It also details roles and responsibilities of those involved in the proposal.

These actions form part of the contract documentation and must be adhered to.

## Roles

Each action in the table below has **one** named person who is responsible for ensuring that the action is implemented. It is ultimately the contractor's responsibility for ensuring the EAP commitments, which may include planning conditions, are delivered.

The Environmental Assessment Team (EAT) are responsible for agreeing any changes to the EAP and for signing off or agreeing to the signing off of the actions.

The contractor and Project Manager are responsible for advising EAT on any changes to method statements or the planned construction work as these may result in changes to the EAP or additional consultation with statutory consultees. EAT will assess the significance of these changes and determine the appropriate course of action.

The contractor is also responsible for implementing good environmental practice on site, in line with their own EMS. Typical issues include:

- any working hour restrictions
- dust suppression measures
- traffic management
- site waste management
- materials management
- vehicle maintenance and management
- pollution prevention and control (including storage, refuelling and incident response)
- response procedures e.g. services strike, contaminated land
- hazardous materials handling and storage
- noise management
- securing and delineation of working areas including signage

## Environmental Audits

It is anticipated that any audits will be undertaken during the working period.

## Environmental Incident Reporting system

### Procedure

1. STOP  
Before you report the incident, stop the work
2. CONTAIN  
Where safe to do so, carry out any local site pollution prevention or emergency incident measures
3. NOTIFY

Report the incident to the (24 hour) NRW incident hotline 0300 065 3000, stating that it is an NRW caused incident and giving full details of the incident, including location and contact details. Also request, and note, the incident number.

4. REPORT

Report the incident (including the incident number) to: the EMS team  
([EMS.team@cyfoethnaturiolcymru.gov.uk](mailto:EMS.team@cyfoethnaturiolcymru.gov.uk))

All environmental incidents must be reported at the earliest opportunity to the ECC Project Manager, Site Supervisor, NRW Project Manager and NRW Environmental Project Manager. In addition, near misses must be reported via the hotline where there was/is the potential for a significant impact and where lessons can be learned.

Initial reports for such incidents and near misses must be followed by a written report using the contractor's in-house forms. This must include the following information:

- project/location
- date
- contractor
- details of what happened
- cause of incident
- lessons learned

This final and comprehensive investigation report is to be provided by the contractor to the ECC Project Manager, NRW Project Manager and Safety, Health and Environment Manager within 14 days.

## Summary Scope of Works

The Afon Mawddach flows in a southerly direction towards the Mawddach Estuary. The site is located approximately 700m downstream of where the A470 road crosses the Afon Mawddach at the village of Llanelltyd, and immediately upstream of the confluence where the Afon Wnion meets the Afon Mawddach. The failed section of sheet pile is located at national grid reference SH 71189 19082. The proposed works are located within the Pen Llŷn a'r Sarnau/ Lleyen Peninsula and the Sarnau SAC and the Aber Mawddach / Mawddach Estuary SSSI with a further two SAC's and four SSSI's located within 2km of the proposed works.

**Flood risk assets** along the Afon Mawddach near Llanelltyd, Dolgellau have been subject to erosion and washout over many years and have become a significant public safety hazard. **NRW operate and maintain these assets under its permissive powers** and are inspected every two years by an Asset Inspector.

The assets in question include a 1,000m long raised earth embankment, 100m of steel driven piles and an outfall structure. The steel driven piles were installed in the early **1960s** by our predecessors (Welsh Water Authority) as channel side revetment to protect the embankment from erosion.

A 30m section of the steel sheet piles have catastrophically failed due to the continual erosion and sediment washout over the years. The structure poses a significant public health and safety issue due to the protruding steel angled towards the river and the steel fixing rods that present an entrapment hazard to users of the river.

## Relevant Contact Details

<b>Project Sponsor</b>	
<b>Project Executive</b>	
<b>NRW Project Manager</b>	Sherron Kitchen
<b>NRW Environmental Advisor</b>	
<b>Engineering and Construction Contract Project Manager</b>	
<b>Project Manager</b>	David Barton
<b>NRW Environmental Clerk of Works (EnCoW)</b>	
<b>Contractor Site Manager</b>	
<b>Contractor Environmental Lead</b>	
<b>Other Specialists</b>	

## Environmental Action Plan

Ref no	Objective	Action (only allocate one action to each "Ref no")	Responsibility (action must only be allocated to one project role/person)	Reference to further information	Progress and Further Action	Sign off and date
<b>Pre-construction</b>						
A1.1	Comply with relevant legislation, regulations, consents and permits	Obtain Flood Risk Activity Permit (FRAP) for permanent and temporary works	NRW PM/ (perm) Contractor (temp)			
A1.2	Comply with relevant legislation, regulations, consents and permits	Obtain Site of Special Scientific Interest (SSSI) Assent for Afon Mawddach SSSI				
A1.3	Comply with relevant legislation, regulations, consents and permits	Habitats Regulations Assessment to be undertaken for Pen Llŷn a'r Sarnau/ Lleyn Peninsula and the Sarnau Special Area of Conservation (SAC)				

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A2.1	Communicate information about project to landowner	Liaise with landowner to discuss project design to confirm understanding and agree structures to remain.	NRW PM			
A2.2	Communicate information about project to landowner	Liaise with landowner to agree construction programme and follow design and access statements access routes.				
A3	Develop good relationships with local community	Attend consultation events in the area if required.	NRW PM			

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A4	Avoid impacts on breeding birds	<p>Where possible, all vegetation clearance should be undertaken outside the main breeding season (Between October and February inclusive).</p> <p>Any vegetation clearance being undertaken within the main breeding season should be conducted under a watching brief by an experienced Ecological Clerk of Works (ECoW).</p> <p>Any identified nests will be safeguarded until the chicks have fledged to ensure there are no direct impacts upon nesting birds.</p>	Contractor	<p>The site is located within the Mawddach Estuary SSSI. Species of interest include breeding wading birds.</p> <p>Refer to the Llanelltyd SSP Preliminary Ecological Appraisal (PEA):</p> <p>RWR-JBA-00-00-RP-EN-0001 Preliminary_Ecological_Appraisal</p>	SSSI Assent	
A5.1	Avoid impacts on reptiles and amphibians	Two-staged vegetation clearance should be conducted under a watching brief by an Ecological Clerk of	Contractor	Refer to the Llanelltyd SSP (PEA):		

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		<p>Works (ECoW) between April and September to avoid the reptile hibernation period (which takes place October - March).</p> <p>The first stage is to cut the vegetation down to 15 cm and the second stage is to bring the vegetation down to ground level at least more than two hours or the following day after the first stage.</p> <p>All cleared vegetation should be moved to areas outside of the construction footprint to encourage reptiles to move away. Vegetation in working areas will be maintained short for the duration of the project to reduce the likelihood of disturbing reptiles. An Ecological Clerk of Works (ECoW) should supervise the</p>		RWR-JBA-00-00-RP-EN-0001 Preliminary_ Ecological_ Appraisal		

Ref no	Objective	Action (only allocate one action to each "Ref no")	Responsibility (action must only be allocated to one project role/person)	Reference to further information	Progress and Further Action	Sign off and date
		vegetation clearance process.				
A5.2	Avoid impacts on reptiles and amphibians	Undertake eDNA survey for Great Crested Newts	NRW PM	Refer to the Llanelltyd SSP PEA:  RWR-JBA-00-00-RP-EN-0001 Preliminary_Ecological_Appraisal		
A6.1	Avoid impacts on bats	Where possible, works should be carried out in daylight hours between late March and October. If works must be carried out during this period at night, any artificial worksite lighting should be minimised. Any floodlights should be fitted with a directional cowl to avoid light-spill onto the watercourses and surrounding woodland habitats.	Contractor	Refer to the Llanelltyd SSP PEA:  RWR-JBA-00-00-RP-EN-0001 Preliminary_Ecological_Appraisal		

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A6.2	Avoid impacts on bats	<p>There is currently no proposal for any trees to be removed or impacted by the proposed works. However, if this changes a Preliminary Roost Assessment (PRA) will be required to be carried out by a suitably qualified ecologist.</p> <p>If potential roost features are identified, further surveys will be required.</p>	NRW PM			

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A7.1	Avoid impacts on fish	<p>It is currently understood that there will be no in-channel working and sheet pile removal will be completed from the banks edge.</p> <p>The proposed works have the potential to cause disturbance to fish populations within the Afon Mawddach with Allis Shad being particularly sensitive to vibration of the water column. This can be effectively mitigated by carrying out the works outside of the main migratory and spawning period, October - late February (this can vary river to river and Natural Resources Wales (NRW) should be consulted). These measures should be agreed in advance with the NRW Fisheries team.</p>	NRW PM	<p>The site is located within the Mawddach Estuary SSSI. Species of interest include fish.</p> <p>Refer to the Llanelltyd SSP PEA:</p> <p>RWR-JBA-00-00-RP-EN-0001 Preliminary_Ecological_Appraisal</p>	<p>Allis Shad fish species have been identified in the watercourse and advice on avoiding impact to these species should be agreed with NRW Fisheries Officer before commencing works.</p> <p>Obtain SSSI Assent.</p>	

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A7.2	Avoid impacts on fish	If in-channel working is proposed, it is unlikely that works will require complete closure of the river. However, should this become necessary it is likely that in-river construction works may only be permitted between June and September (inclusive) before the fish spawning season starts.	Contractor	The site is located within the Mawddach Estuary SSSI. Species of interest include fish.  Refer to the Llanelltyd SSP PEA:  RWR-JBA-00-00-RP-EN-0001 Preliminary_Ecological_Appraisal	Obtain SSSI Assent.	

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A8.1	Avoid impacts to otter	<p>Works near the watercourse should not be undertaken at night and the river should not be illuminated by lighting, such as security lights, during works.</p> <p>Excavations left overnight should either be covered, or an escape ramp installed to prevent the trapping of animals such as Otter. Should an Otter be encountered on site during the works, all works should cease immediately, and advice be obtained from an experienced ecologist.</p> <p>An Otter check should be completed as close to the construction works starting as possible in order to identify any potential new holts or resting areas within the site area.</p>	Contractor	<p>The site is located within the Lleyn Peninsula and the Sarnau SAC. Species of interest Otters, however they are not the primary reason for selection.</p> <p>Otters have been identified in close proximity to the survey area, and it is likely that Otter use the Afon Mawddach and ditches on site for commuting and/or foraging.</p>	<p>Carry out a Habitats Regulations Assessment (HRA) to determine the potential for likely significant effects on species in designated sites.</p> <p>Obtain SSSI Assent.</p>	

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A8.2	Avoid impacts to otter	If needed, agree any additional mitigation measures with the ecologist and update Method Statement.	Contractor			
A9	Avoid impacts to Water Vole	No longer than a week before mobilisation, a suitably qualified ecologist to undertake check of the working area for Water Vole signs.  If needed, agree any additional mitigation measures with the ecologist and update Method Statement.	Contractor	No signs of water voles were recorded during the survey.		
A10	Protect habitats of principal importance	Agree working areas and methods with NRW to minimise loss and harm to existing habitats.  Carry out a Habitats Regulations Assessment (HRA) to determine the potential for likely significant effects on designated sites.	Contractor	The site is located within the Lleyn Peninsula and the Sarnau SAC and the Mawddach Estuary SSSI.		

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A11	Prevent the spread of invasive non-native species (INNS) on site	<p>No Invasive Non-Native Species (INNS) were recorded during the site walkover.</p> <p>Develop an INNS management plan detailing appropriate methodology for ongoing management, control and/or removal. Agree with NRW PM.</p>	Contractor	Himalayan Balsam and Japanese Knotweed, American Mink and Rhododendron within close proximity to the site were returned in the desk study.		
A12.1	To minimise the amount of waste taken to landfill and ensure compliance with legal controls	Prepare a Site Waste Management Plan (SWMP) to consider the waste types and quantities that are likely to be produced during the project, with management actions including re-use, recycling, recovery and disposal, and a declaration that waste will be managed appropriately and in accordance with the Duty of Care.	NRW PM	JBA SWMP		

Ref no	Objective	Action (only allocate one action to each "Ref no")	Responsibility (action must only be allocated to one project role/person)	Reference to further information	Progress and Further Action	Sign off and date
A12.2	To minimise the amount of waste taken to landfill and ensure compliance with legal controls	Carry out environmental sampling to confirm excavated material is suitable for reuse within the project.	NRW PM			
A12.3	To minimise the amount of waste taken to landfill and ensure compliance with legal controls	Apply for any waste licences / exemptions required and arrange waste facilities in accordance with Duty of Care requirements.	Contractor			
A13	To maintain soil quality and health from works such as excavation and material storage	Develop a materials management plan for construction works to ensure soil quality and health.	Contractor			
A14	Limit disruption to landowners and visitors	Access routes to be adhered to agreed by NRW.  Set up fencing / signage for the main works	Contractor			
A15.1	Develop and maintain good relationships with the landowners and visitors	Inform the landowners and visitors of the construction programme.	Contractor			

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A15.2	Develop and maintain good relationships with the landowners and visitors	Provide advance warning to the landowner and visitors.	Contractor			
<b>During construction</b>						
B1.1	Comply with relevant legislation, regulations, consents and permits	Adhere to all conditions of SSSI Assent and HRA.	Contractor	EAP Clause A1		
B1.2	Comply with relevant legislation, regulations, consents and permits	Adhere to all conditions of the Flood Risk Activity Permit.	Contractor	EAP Clause A1		
B2	Communicate information about project to landowner	Keep landowner informed of the progress and any activities that could affect them (e.g. abnormal loads on the access route). Ensure access routes remain open.	Contractor	EAP Clause A3 and A4		

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B3	Avoid impacts on breeding birds	Adhere to any exclusion zones and adjusted working methods following the nesting bird check. Any identified nests will need to be safeguarded until the chicks have fledged to ensure no direct impacts upon nesting birds.	Contractor	EAP Clause A4		
B4.1	Avoid impacts on reptiles	Provide a toolbox talk to all site staff advising of potential presence of reptiles and the procedures in place if any are seen in or adjacent the working area.	Contractor	EAP Clause A5		
B4.2	Avoid impacts on reptiles	Any vegetation clearance to be carried out under ecologist supervision.	Contractor	EAP Clause A5		

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B6.1	Avoid impacts on bats	Comply with any Precautionary Working Method Statement (PWMS) prepared if PRA surveys are required and conducted. A Suitably Qualified Ecologist (SQE) must be present on site to oversee the works when PWMS are being followed.	Contractor	EAP Clause A6		
B6.2	Avoid impacts on bats	Comply with method statement and conditions of any European Protected Species Mitigation License (if needed).	Contractor	EAP Clause A6		
B7.1	Avoid impacts on fish	Adhere to the agreed in-channel works method statements (if required) agreed with the NRW fisheries officer.	Contractor	EAP Clause A7		

Ref no	Objective	Action (only allocate one action to each "Ref no")	Responsibility (action must only be allocated to one project role/person)	Reference to further information	Progress and Further Action	Sign off and date
B7.2	Avoid impacts on fish	If in-river construction works are required works may only be permitted between June and September (inclusive) before the fish spawning season starts. This should be agreed with the NRW fisheries officer.	Contractor	EAP Clause A7		
B8.1	Avoid impacts to otter	Provide a toolbox talk to site staff advising of potential presence of otter and the procedures in place if otters are seen in or adjacent the working area.	Contractor	EAP Clause A8		
B8.2	Avoid impacts to otter	Comply with any additional mitigation measures identified in pre-start survey.	Contractor	EAP Clause A8		
B8.3	Avoid impacts to water vole	Comply with any additional mitigation measures identified in pre-start survey.	Contractor	EAP Clause A9		

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B9.1	Prevent the spread of INNS on site	Provide a toolbox talk to all site staff noting common invasive species that may be encountered and the procedures in place if one is found.	Contractor	EAP Clause A11		
B9.2	Prevent the spread of INNS on site	All equipment to be fully cleaned before being taken to the site, checked on arrival and rejected if not, and clean off equipment before leaving site.	Contractor	EAP Clause A11		
B9.3	Prevent the spread of INNS on site	Comply with biosecurity measures set out in the agreed works method statements.	Contractor	EAP Clause A12		
B10	Prevent impact to unknown archaeology	If any archaeology is encountered stop works and contact NRW PM for advice.	Contractor	EAP Clause A13		

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B11	Minimise the amount of waste taken to landfill and ensure compliance with legal controls	Adhere to SWMP and update regularly. Undertake regular audits of SWMP and undertake corrective actions accordingly.	Contractor	EAP Clause A12		
B12	Maintain soil quality and health from works such as excavation and material storage	Adhere to materials management plan during construction.	Contractor	EAP Clause A13		
B13	Limit disruption to landowners and visitors	Comply with the agreed working hours. Turn off site lighting when not in use. Turn off generators and plant equipment when not in use. Keep a complaint log onsite. Any complaints should be reported at progress meetings.	Contractor	EAP Clause A14		

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B14	Develop and maintain good relationships with the landowners and visitors	Inform and update the landowners and visitors of the works through appropriate means.	Contractor	EAP Clause A15		
<b>Post-construction</b>						
C1.1	Communicate information about proposed works and proposed access route	Inform landowner of works completion.	NRW PM			
C1.2	Communicate information about proposed works and proposed access route	Confirm that site reinstatement is to landowner satisfaction.	NRW PM			

Ref no	Objective	Action (only allocate one action to each "Ref no")	Responsibility (action must only be allocated to one project role/person)	Reference to further information	Progress and Further Action	Sign off and date
C2	Prevent the spread of INNS	Inspect works area in the next growing season following completion of works. If INNS are found, carry out treatment for removal of the INNS and additional monitoring.	NRW PM			
C3	Record artefacts of archaeological interest	Record any archaeological findings following agreed procedures and submit report to Heneb (statutory team).	NRW PM			
C4	Minimise the amount of waste taken to landfill and ensure compliance with legal controls	Complete SWMP at end of works and submit to NRW for approval.	Contractor			
C5	Ensure adequate reinstatement of working areas following construction completion	Undertake a post-works condition survey (including photos) of the site and works area including access routes, to ensure reinstatement to the same as pre-works, or to a better standard.	Contractor			

