



Golden Hill to Milford Haven 132kV Cable Reinforcement HDD Scope

Construction Environmental Management Plan (CEMP)

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1 Background

1.1 Introduction

Following the National Grid Electricity Distribution (NGED) assessment of future demand and generation growth, Engineering Justification Paper EJP179 was approved as part of NGED's ED2 Load Related Expenditure program. This project not only addresses capacity constraints but also enhances network resilience, ensuring compliance with security of supply standards and supporting future network developments, including potential renewable generation connections and increased electrification demand.

Project Overview:

To deliver EJP179, two new 132kV circuits need to be installed between Pembroke GSP, Golden Hill BSP and Milford Haven Grid.

Circuit 1

Pembroke GSP to Golden Hill BSP – A new 7km 132kV underground cable circuit, utilising an existing steel pipe between Pembroke GSP and Golden Hill BSP, reducing civil works and minimizing disruption.

Circuit 2

Milford Haven Grid to Golden Hill BSP – A new 9km 132kV underground cable circuit connecting Milford Haven BSP to Golden Hill BSP via open cut and horizontal directional drill methods. This will terminate onto the existing 132kV overhead circuit at Golden Hill, enabling the reconfiguration necessary to link Milford Haven to Pembroke through the newly installed cable circuit.

Failure to reinforce this network could lead to significant constraints on the Pembroke area's energy infrastructure, potentially limiting future industrial growth and increasing the risk of outages during peak demand. The new circuits will improve contingency planning, reduce customer minutes lost (CMLs), and ensure long-term network reliability

This Construction Environmental Management Plan (CEMP) covers the horizontal directional drill scope of works associated with **Circuit 2, The Milford Haven Grid to Golden Hill BSP**. The Circuit 2 cable installation and the Pembroke GSP to Golden Hill BSP (circuit 1) scope will be covered in separate CEMPs.

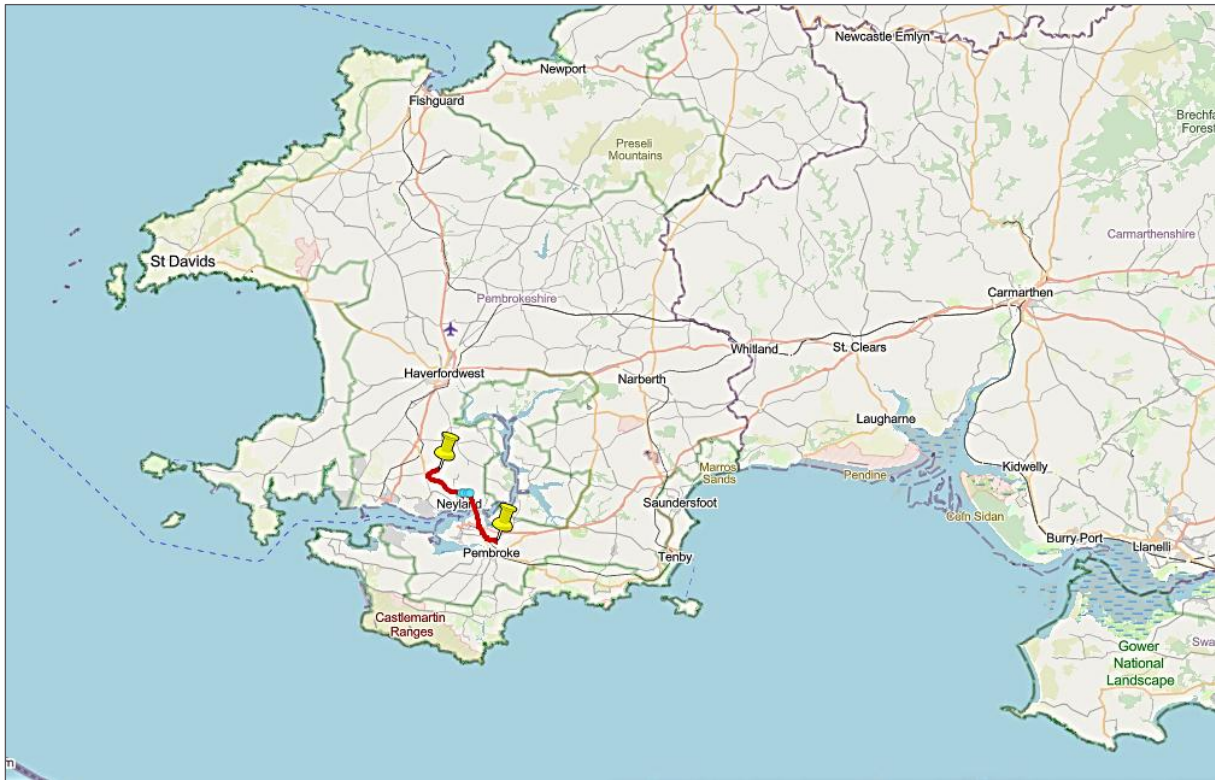


Figure 1: Locality Map

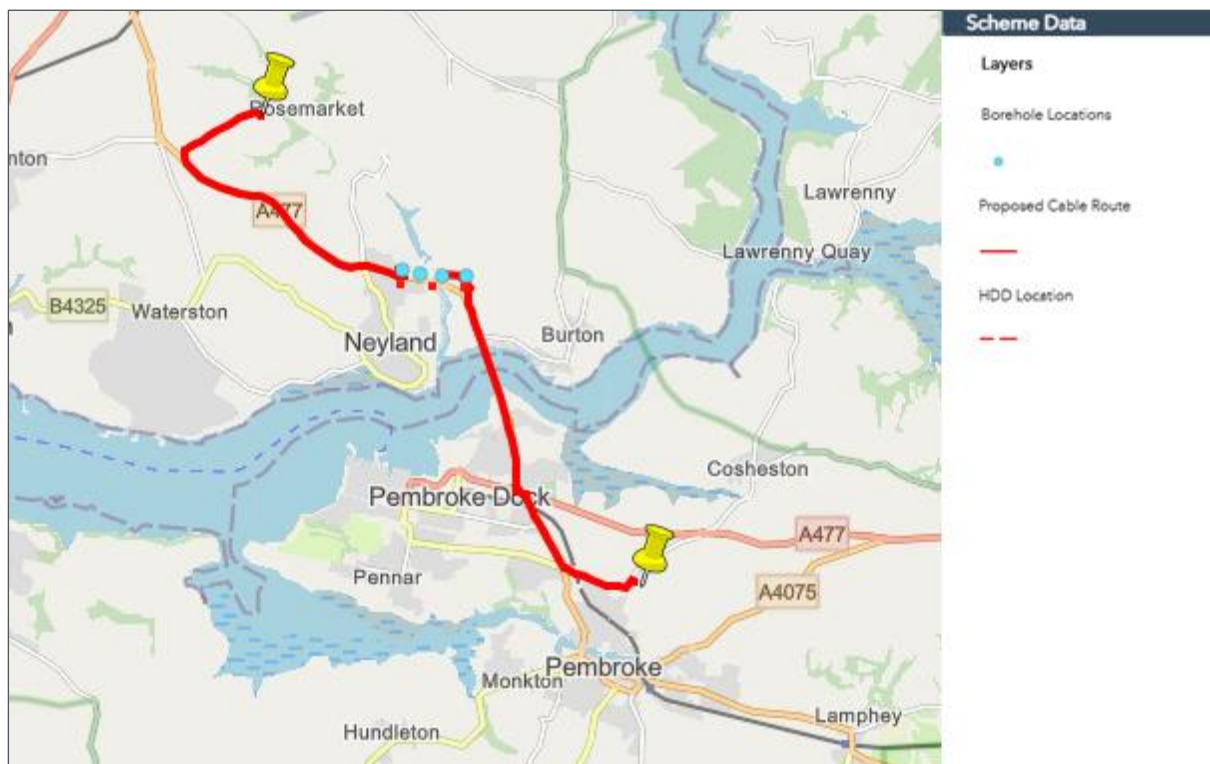


Figure 2: Milford Haven Grid to Golden Hill BSP Overview

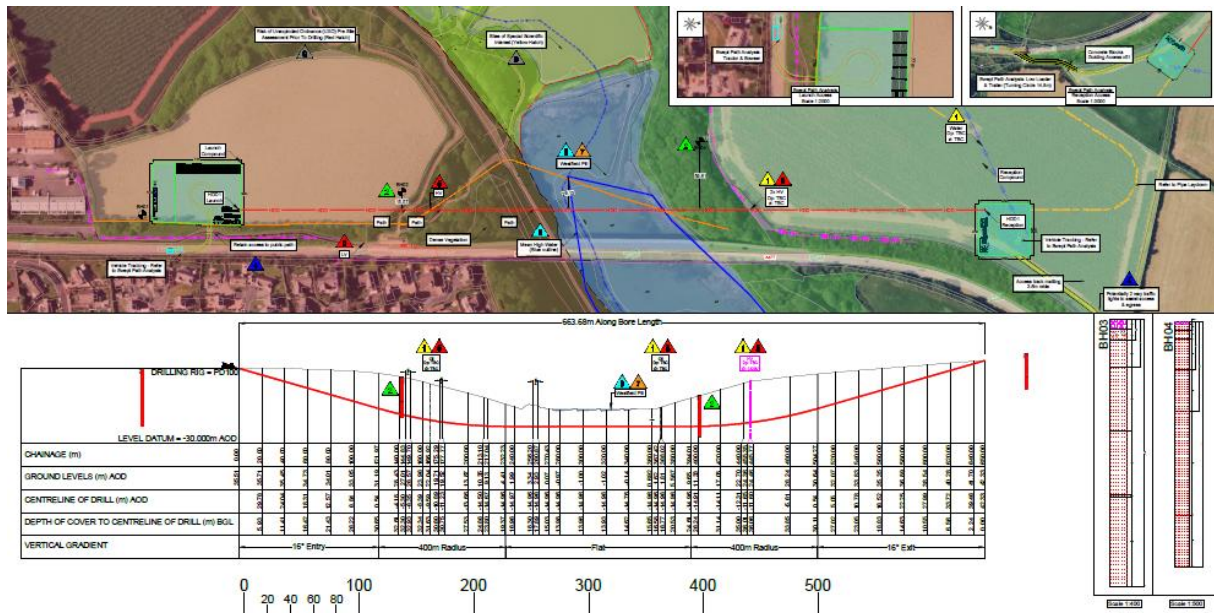


Figure 3: HDD design overview

1.2 Scope of Work

1.2.1 Phase 1 Early Works

Ground investigation (GI) works are required to assess the ground conditions to inform the final design for the proposed cable route and Horizontal Directional Drill (HDD) design. The scope of GI work includes:

- Installation of track matting for access to borehole locations
- 4 No. Dynamic Sampling with Rotary Core boreholes (200mm wide) to a depth of 20m bgl.
- A number of machine excavated trial pits along the highway
- Standard Penetration Test (SPT)
- In-situ thermal resistivity testing
- Geotechnical Sampling
- Geoenvironmental sampling and testing.

1.2.2 Phase 2 Construction Works

Due to structural constraints on the bridge crossing the Westfield Pill, the cable will cross beneath the watercourse to the North of the A477 using a horizontal directional drill. The drill will be 715m in length, and will cross the Westfield Pill at a minimum depth of 15.25m below the bed of the watercourse to mitigate interaction with the habitat. From the reception pit, the cable will continue on through open cut excavation towards Milford Haven. The open cut excavation scope will be covered in a separate CEMP.

Key construction activities include:

- Compound and welfare establishment
- Deliveries
- Excavation of launch and reception pits
- Cable ducting
- Cable installation
- Backfilling and reinstatement
- Cable jointing
- Horizontal Directional Drill (HDD)

1.3 Programme

The duration of the construction phase work can only be estimated at this stage.

Phase 1 early works are estimated to take 5 days per borehole.

The drill is estimated to take place between September 2026 and March 2027.

1.4 Objective of the CEMP

This CEMP contains the site-specific control measures that will be applied by NGED and its contractors during the project. The broad purpose of the CEMP is to:

- Provide a mechanism for ensuring that measures to mitigate potentially adverse environmental impacts are implemented;
- Provide assurance to third parties that their requirements with respect to environmental performance will be met; and
- Provide a framework for compliance auditing and inspection.

A copy of this CEMP will be provided to the Contractor working on behalf of National Grid Electricity Distribution. It must be accessible to all site personnel and representatives of the relevant enforcement authority, and all subcontractors. The roles and responsibilities of key personnel throughout construction are outlined in Section 1.5 below.

The Contractor is required to maintain a copy of the CEMP at the work site for reference by the full workforce.

1.5 Project roles

The National Grid Electricity Distribution project team and all appointed contractors will be responsible for ensuring that the measures contained within this CEMP are complied with throughout the duration of the works.

Table 1 Project roles for the NGED HDD Works

Role	Responsibilities
Project Engineer/ Manager	Project Manager leading the project team; responsible for all aspects of scheme delivery including but not limited to: • Ensuring that the CEMP is implemented and adhered to by all those involved in the construction works • Resourcing delivery of the required works • Financial reporting • Preparation of the detailed design including all preparatory surveys • Coordinating all National Grid Electricity Distribution disciplines involved in the works • Coordinating all interfaces with NGED and their contractors • Responsible for all NGED required documentation and project information
NGED Consents and Wayleaves Specialist	• Negotiation of land access licenses and permanent easements. • Obtaining consents as required.
NGED PMO Environment Lead	• Updates to this CEMP with the Project Manager • Monthly auditing of site during main works with the Project Manager • Responding to all environmental incidents • Obtaining necessary environmental consents/permits and licences • Ensuring compliance to this CEMP along with the statutory legal requirements relevant to the works.
Technical specialist advisors	Suitably qualified and experienced consultants to supervise and provide support on the relevant aspects of the works, which might include an arboriculturist, soil specialist, ecologist, archaeologist, land rights etc.
Principal Contractor	Complying with the requirements of this CEMP including: • Controlling all noise, vibration, dust, vehicle air emissions and lighting to prevent causing a nuisance to sensitive receptors. • Correctly segregating and disposing of site wastes. • Applying pollution prevention techniques to all site activities. • Responding to and reporting environmental incidents and near misses.
All Staff	Complying with the requirements of this CEMP including: • Work in accordance with Environmental Procedures, any Environmental Plans and Method Statements. • Applying pollution prevention techniques to all site activities. • Responding to and reporting environmental incidents and near misses.

2 General Environmental Arrangements

2.1 Competence, training and awareness

The Contractor will produce a site induction that every member of the workforce shall be required to participate in prior to starting work on the site.

The level of induction training will depend upon the position and duties the person is to perform. The site induction will include:

- A brief overview of the works to be undertaken
- An overview of the site specific CEMP with the following topics presented:
 - Ecology: working adjacent to protected sites and priority habitats, protected species, management, mitigation and controls;
 - Water management: legislation, agreed buffer zones, control mechanisms. Flood risks and emergency response procedures;
 - Waste management: legislation, segregation, contamination, best practice;
 - Nuisance: dust, behaviour, noise, vibration, management and controls;
 - Working around trees: tree and root protection;
 - Contaminated land: recognising and dealing with contaminated material; and
 - Spill and emergency response.
- An overview of the health & safety management measures required at the site.

NGED will require its contractors to provide continuing training and raising the awareness of the workforce.

This shall be delivered in the form of Toolbox Talks tailored to the specific environmental mitigation measures required, dependent on the work activities being undertaken. NGED will also directly deliver supplementary Toolbox Talks.

The contractor shall maintain records of all inductions and Toolbox Talk deliveries. Copies will be provided by contractors to NGED and will be available on request.

2.2 Communication

The provision of advanced notification of the works to those most affected will be coordinated between NGED and the NGED appointed Land and Property consultants.

All complaints will be acknowledged on receipt and the NGED Project Manager shall assess the complaint and determine what information is required from all parties in order to formulate a response. All complaints shall be recorded and investigated.

In the event a complaint concerning dust, noise or air quality is received by the Local Authority, they may request the monitoring data from NGED. Any request made to NGED by the Local Authority for the release of dust, noise or air quality data will be responded to within a reasonable timeframe.

All communications from the regulatory authorities received at the worksites by the Contractor shall be immediately reported to the NGED Project Manager. A record of all communications shall be maintained.

Through the induction, all members of the workforce shall be made aware that any direct approaches from members of the public should be directed to the Contractor Site Manager. The Contractor shall notify the NGED Project Manager as soon as reasonably practicable of any public complaints or queries that are received.

The environmental performance of the project shall be communicated at regular site meetings. Notes of the meetings shall be distributed and shall assist in the environmental management of the project.

The NGED Environmental Lead shall arrange and attend meetings with relevant statutory bodies as necessary.

Site Environmental Notice Boards shall display the Environmental Policy of NGED, Emergency Contacts List, relevant statutory and non-statutory advice and guidance; and any other relevant information. These Environmental Notice Boards shall be situated in prominent positions in the main reception area of the site office.

The Contractor will erect notices on site to indicate environmentally important and/or sensitive areas that could potentially be affected by the construction works, including proximity to sensitive sites and those containing protected species. These notices may indicate that some areas are “out of bounds” for construction traffic and personnel.

2.3 Monitoring

Monitoring will be undertaken as specified before, during and post construction, to ensure compliance with the CEMP and to validate the predictions made by the assessments which were done at pre-construction phase.

2.3.1 Pre-construction

Preconstruction assessments will be undertaken to determine the baseline conditions and be used to monitor the effects of construction during the works. Preconstruction surveys which be used for monitoring may include but not be limited to habitat and ecology surveys, access route and record of condition surveys, ground investigation and baseline noise surveys where required.

2.3.2 Daily Construction Inspections

The Contractor will undertake and record daily visual inspections

Daily inspections of the following should be undertaken:

- Visual inspection of the site perimeter to check for dust deposition (evident as soiling and marking) on vegetation, cars and other objects;
- Visual inspection of the local haul roads to check their condition to ensure there is no build-up of dust or earth deposits liable to cause dust emissions as vehicles pass;
- Vehicle, equipment and plant inspections shall be completed to check the absence of damage or maintenance issues and that it is correctly functioning;

- Visual inspection of all acoustic barriers / screening to check they are present and in good condition;
- Visual inspection of waste containers to verify wastes are being correctly segregated and to confirm the absence of mixing of hazardous and non-hazardous wastes;
- If a waste collection is made, a check shall be made of the Waste Transfer Note / Hazardous Waste Consignment Note provided for the collection.
- Ecological inspection of the site to check for any changes from the initial ecological appraisal. Checks will be done to identify any new ecological constraints such as nesting birds, badger activity etc.

When potentially dust-emitting activities are being conducted, the level of dust generation will be visually monitored. A record shall be added to the official site diary when dust emission conditions have been observed and; when necessary, mitigation measures taken.

Any elements of the site management found to be in an unsatisfactory condition during the site inspection shall be addressed by the Contractor on the day. In the event it is not possible to address the matter on the day it is raised, a note of the reason why shall be made on the inspection record sheet.

2.3.3 Post Construction

A post construction site visit will be made with the respective landowners and regulatory authorities as appropriate to ensure that re-instatement has been completed to the satisfaction of all parties.

Any post construction monitoring which is required by specific consent conditions will be undertaken in accordance with the specific consent/licence requirements. All consents and licences will be closed out with the issuing authority.

3 General Site Arrangements

3.1 Working Hours

Proposed core working hours are:

- Monday to Friday 08:00-18:00
- Saturdays 08:00-13:00
- During HDD 08:00 – 18:00 Monday - Sunday

An additional one hour start up and shut down period is permitted. This time may be used only for deliveries, movement to place of work, unloading, maintenance and general preparation work.

Note that certain activities which are directly related to the stability of the electrical grid and local supply might need to be undertaken outside of core working hours. Activities linked to outages, faults and emergency return to service which could be required outside of core hours will be undertaken in line with the Best Practicable Means (BPM) as specified in section 5.8 of this CEMP.

3.2 Site Lighting

No permanent site lighting shall be required for the scope of work. In any instances where temporary lighting is required, construction lighting shall be positioned properly and directed downwards to minimise impacts of light pollution on neighbours and wildlife. Site lighting will be switched off or its use minimised during periods of site inactivity.

3.3 Security

Site security for the worksites during the core hours shall be the responsibility of NGED's contractors.

4 Environmental Emergency Preparedness & Response

4.1 Emergency Preparedness

The Contractor will prepare a site-specific Pollution Prevention Plan as well as an Environmental Emergency Response and Preparedness Plan and submit to NGED for acceptance prior to construction start.

4.1.1 Spill kits

Spill kits capable of dealing with hydrocarbon and chemical spills shall be available at key locations at all worksites. Each storage location shall be clearly visible to the workforce including signage.

The spill kit contents shall include absorbent pads, absorbent booms, absorbent granules and hazardous waste disposal sacks as a minimum. The Contractor will ensure that they remain adequately stocked to deal with environmental incidents.

4.1.2 Fire prevention

The Contractor shall ensure that appropriate plans and management controls to prevent fires are in place. Means to raise the alarm in the event of a fire shall be available at the points of work and at the site establishment facilities. An assembly point shall be designated a safe distance from the active works locations and will be communicated to all members of the workforce before works commence. The workforce shall assemble at the point for a roll call and receive further instructions. All individuals at the worksite, including visitors, will sign in on arrival.

4.1.3 Extreme weather

The Contractor Site Manager will be registered to receive Met Office weather warnings issued in relation to the local area.

All warnings issued by the Met Office for extreme weather with the potential to impact upon the works shall be communicated to the NGED Project Manager on their receipt. The contractor will ensure that all reasonable measures are implemented to protect the site, the staff and the environment in the event of extreme weather events.

4.2 Incident Reporting & Investigation

4.2.1 Reporting

All incidents, including near misses, shall be classified according to the categories outlined in Table 2. All categories of environmental incident shall be reported to NGED by its Contractor(s).

Table 2: Incident Classification

Incident Classification	Definition
Level 4-Near Miss	An event, controlled through implementation of an effective incident control measure (e.g. drip tray used, effective use of noise barrier).
Level-3 Environmental Incident	Incidents that have caused minor harm or damage to the environment e.g. • a minor fuel spill below 20 litres onto ground which is immediately cleared; • a minor spill of a chemical not classified as presenting an ecotoxic risk; • exceeding noise levels; • silt runoff from site which does not enter into a surface water feature; or • Excess dust emissions.
Level 2-Minor Environmental Incident	Incidents that have caused or may cause significant harm or damage to the environment e.g. • a minor fuel spill which impacts a sensitive land feature, a water body, or drains; • a major fuel spillage over 20 litres; • any spillage of a chemical which is classified as presenting an ecotoxic risk; • silt runoff from site which enters a water feature; or • Receipt of a nuisance complaint.
Level 1-Major Environmental Incident	Incidents that cause persistent or extensive harm or damage to the environment and persistent and significant breach of permit/licence or consent conditions e.g. • major pollution of surface water body; • fish or invertebrate kill; • significant damage to protected habitat or species; • Persistent breach of noise or dust consent conditions.

Contact details are outlined in Section 4.2.3 for all emergency contacts relevant to the works. Major incidents shall be reported by NGED's contractor as soon as reasonably practicable. Minor incidents may be reported the next working day should it be more practical to do so. Where major incidents require reporting to a statutory or regulatory body it will be reported by NGED.

4.2.2 Investigation

The Contractor will prepare an investigation report for all environmental incidents.

NGED will require its contractors to prepare an investigation report for all environmental incidents. The report is to include:

- A summary of the environmental incident:
 - nature of the incident;
 - details of any pollutant released including the quantity of pollutant released;
- Location for the incident (e.g. grid reference);
- Receptors that were or could have been impacted;
- An analysis of what led to the incident occurring;
- A summary of immediate actions taken to mitigate the incident.

NGED shall verify the incident investigation and agree with its contractors any further actions that are to be implemented to prevent a reoccurrence of comparable incidents. A timeline for the implementation of all actions shall be established and the contractors will provide details of when they have been implemented.

4.2.3 Emergency Contacts

In the event of an emergency occurrence at the site, NGED and its contractors shall determine the relevant statutory and regulatory bodies that must be notified. Notification shall be in accordance with the measures outlined above in Section 4.2.1.

Table 3: Emergency Contact Details

Contact	Contact Details
NGED Project Manager – Alex James	07948715904
NGED Senior Delivery Manager – David O'Brien	07446171113
NGED Project Engineer – Guy Jones	07394 840921
NGED Project Environmental Lead – Justin Taylor	07423 108072
NRW Emergency Number	0300 065 3000
Health and Safety Executive (HSE Construction)	0345 300 9923

Local Authority – Pembroke County Council	01437 764551
Major Spill Emergency Response – GPT Environmental	01656 741 799
Fire	999
Police	999
Ambulance	999
NGED Electricity Emergency	105

4.3 Incident Response

This section consists of standard incident response procedures, intended to provide guidance for the containment and limitation of adverse effects. All pollution incidents should be managed through the STOP - CONTAIN – NOTIFY concept.

As soon as an incident is identified, the first action should be to **STOP** and inhibit to prevent further discharge to drainage/river/ground.

CONTAIN may constitute control of discharge in the event of a spill, or cessation of works if it is the works that are resulting in the incident, e.g. halting excavations until silt runoff is contained. It is recognised that due to personal health and safety risks it may not always be safe to stop the source of the spill, for instance if a significant volume of an unidentified substance has been released.

NOTIFICATION should take place as soon as practicable, and frequently can take place while further release is being stopped or while a spill is being contained. The emergency contact numbers outlined in Table 4 should be used.

4.3.1 Oil, fuel or chemical spill to ground

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap / valve, correct leaking drum and make safe the area.
- ii. If the spill is migrating, create a temporary bund to prevent further spread by spill kit materials / sandbags.
- iii. If drains or field ditches are located nearby, install drain seals/additional spill kit materials to prevent the spill discharging to the drain or ditch.
- iv. Apply absorbent granules or pads (available from spill kit) to the affected area.
- v. Containment measures should remain in place until the nature and extent of the contamination can be assessed and a remediation strategy must be prepared.

4.3.2 Discovery of unexpected contamination

- i. On the discovery of unexpected contamination, the Contractor will immediately halt works in the area.

- ii. If impacted materials have already been removed, they shall be returned to the excavation or they will be placed on to a membrane to prevent migration of the contaminant to another area.
- iii. Contractor to report the situation to NGED;
- iv. Arrangements will be made between the Contractor and NGED for samples of the contamination to be collected and tested on fast turnaround;
- v. Contractor to only continue with works once the test results have confirmed the contaminant and a safe means of working has been established.

The Contractor shall be free to continue works in areas unaffected by the contamination BUT the Contractor will not speculatively continue to excavate material to find the extent of the contamination without supervision from a geo-environmental engineer.

All impacted materials will be disposed of in accordance with Regulations and the Duty of Care requirements

4.3.3 Oil, fuel or chemical spill to surface water feature

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap / valve, correct leaking drum and make safe the area.
- ii. If source not readily identifiable, contain first (see below) then identify and prevent further release at source.
- iii. Immediately deploy appropriate sized boom from nearest spill kit across affected surface water feature. Use stakes to attach it to the sides of the surface water feature. Tie booms together to increase length if required.
- iv. Supplement with additional booms across the surface water feature, as required, to contain any migration of the spill not halted by the first installation.

All impacted materials will be disposed of in accordance with Regulations and the Duty of Care requirements.

4.3.4 Oil, fuel or chemical spill to drainage system

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap / valve, correct leaking drum and make safe the area.
- ii. If source is not readily identifiable, contain the visible pollutant first, then identify and prevent further release at source.
- iii. Immediately deploy appropriate drain cover(s) to affected gullies.
- iv. Supplement with booms around the gully to contain any migration of the spill;

4.3.5 Explosion / Fire Procedure

Explosion/fire incidents should also be dealt with through health and safety procedures. In the event that a fire is detected or an explosion occurs:

- i. Notify the emergency services and evacuate the area.
- ii. Attempt to tackle the fire with site equipment only when it is safe to do so.
- iii. Ensure that pollution of nearby water bodies including surface water drainage from fire control water or other substances is minimised. Where possible and safe to do so, any site drainage systems should be protected through the deployment of drain seals/ spill kit

materials to ensure any firefighting waters are captured and can be disposed of appropriately.

4.3.6 Silt

- i. Prevent further release at source e.g. cease dewatering the excavations;
- ii. Contain silt and protect sensitive receptors from further discharge:
 - o If a drain is located nearby, install drain seals or deploy spill kit materials to prevent discharge.
 - o If silt flow is in the direction of surface water features deploy hay bales around surface the feature.
 - o If silt is being generated by runoff from stockpiles, deploy spill kit materials, silt fencing or move soil to form a bund at the base to prevent further silt-laden runoff from the stockpile.

4.3.7 Complaint over a nuisance

This procedure should be followed for all nuisance complaints including noise, dust and light.

- i. Immediately stop the activity leading to the complaint; or where not possible to entirely stop the activity reduce it to the lowest possible level e.g. shut off all non-essential plant;
- ii. Remain polite and courteous. If able to resolve the issue through discussion with the complainant determine what action is needed and put it into practice;
- iii. Take the details of the complainant including their name, contact details and address. Contractors will report the details of the complaint and the complainant to NGED;
- iv. NGED to register the complaint on the Complaints Log;
- v. NGED will act on the complaint and remedial actions will be put in place within 24 hours.

4.3.8 Contamination of waste

- i. Assess whether the area needs to be evacuated, such as if fumes are being given off;
- ii. Assess whether the damage can be undone through segregation;
- iii. Complete a risk assessment for the task including consideration of any COSHH risks;
- iv. If it is safe to do so, segregate the waste. If it is not safe to do so then the full waste quantity is to be consigned as hazardous waste;
- v. Contractor to report the incident to NGED;
- vi. Waste to be collected from site in accordance with normal practice.

4.3.9 Discovery of archaeological artefact or heritage feature

- i. Immediately stop works in the area of the artefact or feature;
- ii. Ensure the area is isolated from interference by erecting fencing around the discovery. Prevent vehicles from navigating through this area;
- iii. Provide a safe means for pedestrians; and if possible vehicles, to move around the isolated area;
- iv. Contractor will report the find to NGED Project Environmental Lead
- v. NGED Project Environmental Lead to arrange for the find to be assessed by a heritage or archaeological specialist. The Contractor is to prevent tampering with the find until it has been assessed;
- vi. Works to proceed in accordance with the recommendations given by the heritage or archaeological specialist.

4.3.10 Ecological discovery or damage

- i. Immediately stop works in the area;
- ii. Contractor to immediately report the incident to NGED Environmental Lead;
- iii. NGED to arrange for an ecologist to assess the discovery or damage caused;
- iv. Works to proceed in accordance with the advice received from the ecologist.

4.3.11 Vandalism/theft procedure

Acts of theft and vandalism present the risk that damage may be caused to equipment containing hazardous substances that will cause pollution or to measures which have been installed to prevent the release of pollution. On identifying an act of vandalism or theft:

- i. NGED will notify the Police of the incident.
- ii. Inspect all fuel storage tanks/drums and equipment to ensure there has been no release of the fuel or other hazardous substances, e.g. hydraulic fluid.
- iii. If a spill is identified follow the procedures for Oil, fuel or chemical spills.
- iv. Inspect pollution protection measures, e.g. drainage or silt protection, to ensure it has not been interfered with. Where it is possible to correct any issues identified without causing further release.
- v. Inspect site boundaries to identify the access point if not immediately clear and secure the site.

5 Key Environmental Impacts

5.1 Agriculture and soils

The Contractor must undertake a pre-construction condition survey of the site.

The pre-condition survey should include a photographic record of what the land looks like prior to entry with notes of any existing issues, such as wet areas, damage to hedges and fences etc.

The contractor must liaise in advance with the landowner or land manager as required in order to avoid conflict with any programmed land management operations.

The Contractor must provide a method statement for handling of soils in line with the DEFRA Code of Construction Practice for the Sustainable Use of Soils on Construction Sites.

Topsoil

- Vegetation will be removed prior to stripping by blading off, scarification and raking, before stripping commences. Short managed grass will be removed as turf for reinstatement on launch and reception pit excavations.

- Soil stripping will not take place during periods of heavy rain, or when there is water pooled on the surface. Rainfall and suitability of ground for working will be monitored through daily visual inspection of each working area prior to commencement of activities.
- Soil stripping will be undertaken by a tracked excavator positioned on the surface of the topsoil, and to the maximum topsoil depth without disturbing or removing the subsoil; topsoil depths will be assessed and recorded daily and depths may vary along the route.
- The Contractor will record topsoil depths and keep records during excavation.

Subsoil

- Subsoil removal will generally be undertaken by an excavator positioned where the topsoil has been removed.
- Subsoil will be stored on the opposite side of the excavation to the topsoil.
- Subsoil will be kept separate from topsoil to avoid mixing.
- Large rocks and debris brought to the surface during excavation should be removed by picking or raking, this will not be reused.

Soil Storage

- The stripped topsoil and subsoil will be stored within the working width, separate from each other and from the point of access.
- The stripped subsoil will be stored in an area that will be suitably marked off and signed to differentiate the subsoil from the topsoil stores.
- The soil stores will not be disturbed by other site operations and must not be traversed by vehicles or plant.
-
- If soils from launch/reception pits will be stored for more than 6 months, they are considered long term stockpiles and should be maintained to prevent erosion.

Access Routes

- The use of a designated access route to be used by plant and equipment within the working width is proposed to keep site vehicle movements limited to the site area.
- Tracked excavators or vehicles fitted with low pressure tyres will be used to reduce compaction, but where necessary access routes will be formed from track-mats across the working area.
- Following soil stripping, plant and traffic movements will be confined to designated routes to minimise the potential for soil disturbance, compaction and potential indirect contamination.
- The Contractor will clearly brief the workforce and any subcontractors on the navigation of the designated access routes and these will be signposted where required.

Reinstatement

- Reinstatement of topsoil and subsoil should be undertaken during dry conditions and not during or after heavy rain periods, or when there is water pooled on the surface.
- Soils will be reinstated in the reverse order that they were excavated. Once the subsoil has been reinstated, topsoil will be restored to original levels and profiles using the stored topsoil. No plant or vehicles will drive over the spread topsoil once reinstated to avoid compaction.

5.2 Air quality

Due to the limited amount of dust generating activities and the short duration of works, the potential dust and air quality impacts from the works are considered low. The following measures will be implemented to limit emissions from construction plant and vehicles, which will include the following, as appropriate:

- operation of construction plant in accordance with the manufacturer's written recommendations;
- vehicles and plant will be switched off and secured when not in use;
- vehicle and construction plant exhausts to be directed away from the ground and positioned at a height to facilitate appropriate dispersal of exhaust emissions;
- the enclosure, shielding or provision of filters on plant likely to generate excessive quantities of dust beyond the site boundaries; devices such as dust extractors, filters and collectors on drilling rigs and silos will be used;
- movement of construction traffic around the site will be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the project;
- construction plant will be located away from site boundaries which are close to sensitive receptors, where reasonable and practicable;
- site access points will be designed to minimise queuing traffic adjacent to access points;
- cutting and grinding operations will be conducted using equipment and techniques which reduce emissions and incorporate appropriate dust suppression measures;
- damping down of dust-generating equipment and vehicles within the site and the provision of dust suppression in all areas of the site that are likely to generate dust;
- measures to keep roads and accesses clean;
- dampen down haul roads, as necessary, to reduce dust emissions;
- Seed / seal soil stockpiles to reduce the risk of dust migration.

5.3 Cultural Heritage

A heritage appraisal of the cultural heritage resource within and surrounding the proposed National Grid reinforcement works at Pembroke (the Site). It has been produced to provide an appraisal of designated and undesignated cultural heritage assets within the site, outline the impact that possible works will have on those assets, identify opportunities and constraints and provide recommendations for more detailed assessment where this may be necessary.

The location of the directional drilling has been assessed as Low/Medium for archaeological potential. This would typically have a 30m x 30m launch and reception compound. Consultation took place with the Heneb Development Management) - Regional Head (Dyfed) and Archaeological Planning Manager via email correspondence 01/05/2025. It was agreed that archaeological monitoring would be required during groundworks associated with the construction of the launch and reception compounds. This is because the works area lies within agricultural land which is unlikely to have been recently disturbed.

The Contractor will appoint a suitably qualified archaeologist to undertake the construction phase monitoring in line with the provisions of the approved Written Scheme of Investigation (WSI).

It is recommended that when precise location details are available for the launch and reception compounds further consultation is undertaken to allow for a better understanding of the archaeological receptors within the location. This information will allow for the preparation of a Written Scheme of Investigation to be prepared prior to works commencing and archaeological monitoring taking place.

Even though the heritage appraisal determined a low risk, the Contractor shall be aware of the potential for unexpectedly encountering assets. In the event of uncovering an archaeological find in an unexpected area, the Contractor will handle the incident in accordance with the procedure outlined in Section 4.3.9 of this CEMP. NGED will appoint a suitably qualified archaeological specialist to assess the find and consult with the relevant local authority.

5.4 Ecology

5.4.1 Habitats

The HDD launch and reception sites predominantly comprises arable fields and small blocks of broadleaved woodland and hedges on the field margins, The HDD crosses the West estuary perpendicularly at a depth of 20m below the bed of the watercourse.

Whilst no trees are expected to be removed for the proposed works, works could be located in proximity to existing trees. The National Joint Utilities Guidelines (NJUG) must be followed throughout the works:

The NJUG guidelines define areas around trees where excavation either must not be undertaken or only undertaken under strict conditions in order to avoid or minimise any damage to a tree's root system. These areas are referred to as 'Tree Protection Zones' and are illustrated below.

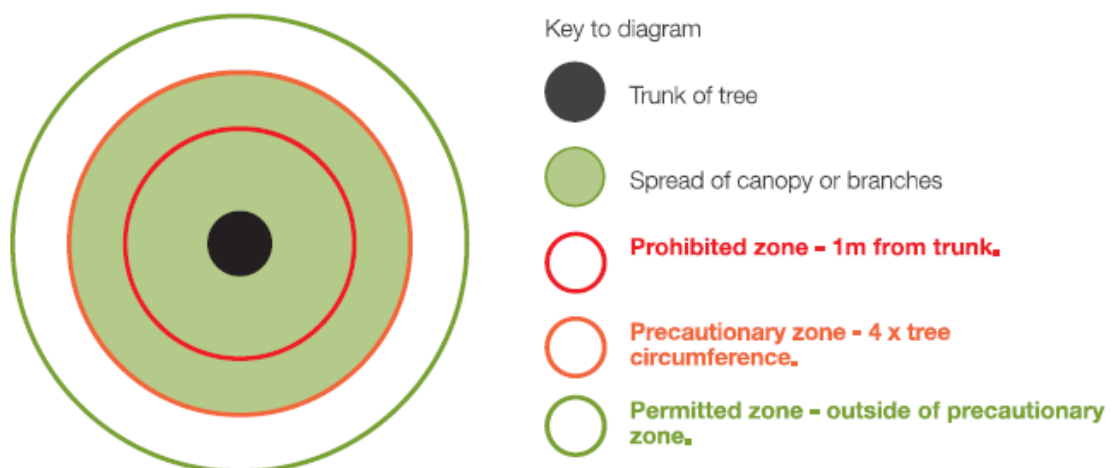


Figure 3: Tree protection zones

The Prohibited Zone

- Do not excavate within this zone.
- Do not use any form of mechanical plant within this zone
- Do not store materials, plant or equipment within this zone.
- Do not lean materials against, or chain plant to, the tree trunk.
- Do carry out prior consultation with the Project Arboriculturist if excavation within this zone appears to be unavoidable.
- Do notify the Project Arboriculturist immediately should any damage occur within the prohibited zone.
- Where excavation must be undertaken within this zone the use of mechanical plant should be prohibited.
- Precautions should be undertaken to protect any exposed roots. Materials, plant and spoil should not be stored in this zone. Consult with the Project Arboriculturist if in any doubt.
- Excavation works may be undertaken within this zone, however caution must be applied and the use of mechanical plant limited. Any exposed roots should be protected.

The Precautionary Zone

- Do not excavate with machinery. Where excavation is unavoidable within this zone excavate only by means of hand tools or compressed air soil displacement, or preferably by the use of trenchless techniques.
- Do not cut roots which occur in clumps or are of 25mm in diameter and over, unless prior consultation has been undertaken with the Project Arboriculturist, as such roots may be essential to the tree's health and stability.
- Do not repeatedly move / use heavy mechanical plant except on existing hard standing or appropriate temporary ground protection.
- Do not store any spoil, materials chemicals or fuels within the precautionary zone.
- Do prune roots smaller than 25mm (except where they occur in clumps) which must be removed by using a sharp tool (e.g. bypass secateurs or handsaw). Make a clean cut and leave as small a wound as possible.
- Do backfill the trench with an inert granular material and top soil mix. Compact the backfill with care around the retained roots. On non-highway sites backfill only with excavated soil.
- Do immediately wrap or cover any exposed roots to prevent desiccation and protect them from rapid temperature changes. Any wrapping should be removed prior to backfilling, which should take place as soon as possible.
- Do notify the Project Arboriculturist of any damage caused to trees.

The Permitted Zone

- Do not cut roots which occur in clumps or are of 25mm in diameter and over, unless prior consultation has been undertaken with the Project Arboriculturist, as such roots may be essential to the tree's health and stability.
- Do use caution if it is absolutely necessary to operate mechanical plant within this zone.
- Do prune roots smaller than 25mm (except where they occur in clumps) which must be removed by using a sharp tool (e.g. bypass secateurs or handsaw). Make a clean cut and leave as small a wound as possible.
- Do immediately wrap or cover any exposed roots to prevent desiccation and protect them from rapid temperature changes. Any wrapping should be removed prior to backfilling, which should take place as soon as possible.
- Do notify the Project Arboriculturist of any damage caused to trees.

5.4.2 Designated Sites

There are seven internationally statutory designated sites within 10 km of the sites, comprising five Special Areas of Conservation (SACs) and two Special Protection Areas (SPAs). There are three nationally statutory designated sites within 2 km of the sites; two Sites of Special Scientific Interest (SSSIs) and one Local Nature Reserve (LNR). Of these, Pembrokeshire Marine SAC and Milford Haven Waterway SSSI are located in close proximity to the site (refer to Appendix A for designated sites map).

Although the works are small in size and scale, are of short duration and temporary in nature, as the works are within 100 m of the designated sites, a Habitat Regulations Assessment (HRA) screening assessment (stage 1) should be undertaken to ascertain the impacts of the works on the SAC, and a SSSI assent will be obtained for works in proximity to the Milford Haven Waterway SSSI.

Considering the size and scale of the works, the remaining eight designated sites are unlikely to be impacted by the works, however, they would be covered as part of the HRA process.

5.4.3 Protected Species

A Preliminary Ecological Appraisal (PEA) has been undertaken by NGED ecology consultants. The assessment identifies any ecological constraints relevant to the project, specifies any further survey or mitigation requirements, and gives recommendations for avoidance and protection through design changes.

The NGED ecology consultant and Environmental Lead shall identify any pre-construction survey requirements. NGED shall ensure that mitigation measures are implemented in consultation with the Ecologist to ensure that no protected species are harmed and disturbance to their habitat is prevented or if not possible, minimised. All relevant licences shall be obtained from the relevant statutory body.

A toolbox talk will be given to brief all staff undertaking the works on the possibility of finding protected species, and what to do if they are encountered. The toolbox talk will provide contactors with information to aid in the identification of protected and invasive species, where to be particularly vigilant of their possible presence; and what to do if any are found during works.

5.4.3.1 Great Crested Newts (GCN)

Pembroke is located within 'Zone C' of the Great Crested Newt Habitat Suitability Index. This suggests that GCN are unlikely to be within the area as it is considered to be 'unsuitable'. The ecology assessment determined that given the above, it is considered unlikely that GCN will be present within the site.

In the event that a Great Crested Newt is discovered on site all works within the area will be immediately halted. The area shall be fenced and signage will be put in place to ensure that all members of the workforce know not to enter the area. The Contractor must immediately report the incident to NGED Environmental Lead who will arrange for an ecologist to assess the discovery.

Works may only proceed in accordance with the advice received from the ecologist.

5.4.3.2 Bats

The drill pit locations are set away from field boundaries with no direct effects on potential bat roosts anticipated. The ecological constraints assessment determined that, should any tree be directly impacted by the works then a ground level tree assessment should be undertaken to ascertain the requirement for further survey.

No artificial lighting will be used which could impact bats. Noise mitigation measures through BPM will be implemented to limit noise disturbance.

Any change to the proposed works, working hours or methodology will require an update to the CEMP and assessment by the consulting ecologist.

5.4.3.3 Badgers

No evidence of badgers such as setts, paths or latrines were identified during the ecology constraints assessment as being in proximity to the proposed works.

Because badgers are mobile species and are considered to be present within the wider landscape, a pre-construction badger check will be undertaken before the start of works. The checks will include the proposed access routes, drill pit locations and a 30m buffer around the proposed work area and access routes. If a badger sett is identified, a 30m buffer zone must be implemented to avoid impacts to the sett, with alternative access and / or works location identified.

Although the works are located in areas with limited badger potential, precautionary measures are recommended to reduce the risk of impacting badgers and hedgehogs, or any other mammals during the works.

Precautionary measures include:

- Mammal ladders (such as a plank) or earth ramps to be placed in any open excavations at the end of each day;
- Cap off any open pipes at the end of each day;
- Cover any open holes, or install mammal ladders or earth ramps in any open excavations at the end of each day to prevent animals from becoming trapped;
- Keep all fuel and other harmful substances in a locked area;
- Ensure any spillages are treated with spill kits;
- Night work should be avoided where possible, and any flood lighting should face away from the Site boundaries; and
- If any fresh sett digging is observed notify an ecologist immediately and leave a 30m buffer around the area until an assessment can be made.

5.4.3.4 Nesting birds

The ecology appraisal determined that hedgerows within the wider landscape (within 10 m of the access track) are suitable habitat for breeding birds. The likelihood of works disturbing breeding birds adjacent to access track is low as the disturbance is not considered to be more than that of working farm traffic.

Removal of vegetation to allow for an access track could impact breeding birds.

It is recommended that works take place outside of the main breeding bird season (March – August inclusive). If this is not possible, a pre-works check for ground nesting birds by an

Ecological Clerk of Works (ECoW) is recommended prior to vegetation removal, laying access track panels and excavations

If any nesting birds are found during the works, the Contractor will immediately fence off the area with a minimum 10m radius. Signage shall be erected to inform the workforce of the exclusion area and purpose. No works may be conducted in this area until it has undergone ecological assessment. Works in the area will be prevented until the ECoW is satisfied that the young have fledged and the nest is no longer in use.

The NGED Contractor will, as far as practicable, ensure the materials are stored in a manner that limits the likelihood of it offering a suitable nesting site. Vehicles, plant and equipment left at site, particularly over the weekend, shall be checked to ensure they have their windows closed prior to leaving site. Vehicles left overnight on site should be checked for the presence of nesting birds prior to use.

5.4.3.5 Other Ecological Habitats and Species

Reptiles

The habitat within the proposed site is considered to be sub-optimal for reptile species given the lack of structure and lack of suitable opportunities for basking, cover and hibernation. Therefore, it is considered unlikely that reptiles will be present within the site.

In the event that reptiles are found on site, work must cease and an appropriately qualified ecologist contacted for instructions on how to proceed.

Isolated features such as the log piles, root plates, manure piles and old tree stumps, could provide suitable refuges and hibernation sites for reptiles, if present. Should any disturbance to potential refuge features be required, it will be undertaken under the supervision of a suitably qualified Ecological Clerk of Works (ECoW).

Invasive Species

The Contractor will produce an Invasive Non-Native Species (INNS) method statement as invasive species have been identified near the site.

Japanese Knotweed and Cotoneasters have been recorded on site but are not expected to be directly impacted by the works. To avoid spread of these species, it is necessary to ensure the site team is aware of the presence, risks and required buffer zones.

It is not anticipated that the NGED works will affect other invasive non-native species, however if that were to change, the contractor will implement a 7m buffer around any identified species. Should avoidance not be possible the removal will be undertaken by an experienced contractor to prevent its spread within the site and to third-party land.

In the event of an unexpected find, the procedure outlined in Section 4.3.10 will be followed.

General Biosecurity Measures

- Ensure vehicles, plant and PPE is clean when arriving at site.

- Ensure vehicles, plant and PPE is clean (visually from soil and debris) before leaving the site.
- Make use of facilities provided on the site to clean footwear/equipment.
- Keep access to a minimum and keep to established tracks. Park vehicles on hard standing where possible.
- Where possible avoid areas of livestock and areas with known plant disease
- Plan visits so that the higher risk areas are visited at the end of the day.

When working in proximity to water, follow the Check, Clean, Dry steps.

Check - Check PPE and equipment after leaving the water for mud, aquatic animals or plant material. Remove anything you find and leave it at the site.

Clean - Clean everything thoroughly as soon as you can, including hard to reach places.

Dry - Dry everything for as long as possible before using elsewhere as some invasive plants and animals can survive for two weeks in damp conditions.

5.5 Ground Settlement

There are no known ground settlement risks at the site.

5.6 Land quality

Should any unforeseen contamination be encountered during construction of the Proposed Development, work will be stopped and the area made safe and the relevant local authority informed as soon as is practicable. A risk assessment will be undertaken to identify additional actions which may be required e.g. further site investigations. Any proposed remedial strategy will be submitted for approval by the local planning authority, if required.

Prior to works commencing appropriate service clearance surveys and utility searches would be undertaken to identify below ground services and utilities to avoid damage to third party property. This would include liaison with the relevant owner/operator to accurately identify the precise location of services/utilities.

5.7 Landscape and visual

The works will be of very limited scale and short duration and are not expected to result in significant landscape or visual effects. The completed scheme will be located below ground and will not have any residual landscape and visual effects.

The following mitigation measures will be implemented during the construction phase of the NGED works:

- Ensure good housekeeping at all times;
- Maintain all fencing and screening to a good standard;
- Ensure that only necessary signage is displayed;
- Avoid unnecessary disturbance to vegetation and habitats which act as a natural visual screen;

- Minimise the extent of the impact by designing part of the works to be located below ground;
- Implement BPM to minimise visual impacts associated with dust generation;
- Temporary compound lighting shall be controlled to prevent unnecessary light spill.

5.8 Noise and vibration

The contractors shall control noise on the working areas in accordance with BS 5228, Noise Control on Construction and Open Sites. The Contractor shall implement Best Practical Means (BPM) in control of noise. Where works are required to take place outside of core hours or are in close proximity to sensitive receptors, the local planning authority will be consulted.

If Section 61 consent is deemed necessary, the contractor will engage with the planning authority to identify construction activities that may require it. This will include a list of the activities/stages for which separate Section 61 applications will be required to enable all parties to agree the most efficient approach to the Section 61 approval(s).

- All plant, equipment and noise control measures applied to plant and equipment shall be maintained in good working order and operated such that noise emissions are minimised as far as reasonably practicable;
- Where vehicle reversing alarms are required, they should be designed to cause the lowest practical environmental impact; preferably they should be directional broadband noise emitters or automatically adjusted to ambient noise levels.
- All employees shall be provided with an appropriate induction and ongoing briefings regarding the management of environmental issues. This will involve emphasising the need for employees to show consideration to the sensitive receptors, including residential neighbours. They will be briefed on not generating unnecessary noise when on site or when leaving and arriving;
- Machines and vehicles in intermittent use will be shut down during periods between works. For example idling of off-track vehicles like excavators and dumpers etc. for periods longer than 5 minutes shall not be permitted unless for safety reasons;
- No radios/stereos (site or vehicle based) will be used on the site.
- Limit operation times to agreed working hours;
- Ensure all ancillary pneumatic percussive tools are fitted with mufflers or silencers of the type recommended by the manufacturers;
- Ensure subcontractors properly maintain and operate all plant according to manufacturer's recommendations so as to avoid causing excessive noise;
- Place vibrating equipment or plant on a base separate to that on which any sensitive structure is located to reduce vibration impacts;
- Take care when unloading vehicles to minimise noise;
- Regularly monitor both on and off site to ensure minimal noise and vibration impacts upon local wildlife.

5.9 Traffic and transport

Access routes for all site vehicles, plant and deliveries to site shall be detailed in a Construction Traffic Management Plan which will be produced by specialist traffic and transport consultants. The following measures will be implemented by the NGED Contractor:

- Access to site shall be from agreed points only.
- All accesses to permanent construction compounds shall be gated, signed and locked outside working hours to prevent unauthorised access.
- Appropriate signing shall be used to indicate roads barred for construction traffic and approaches to the access points.
- The contractor shall work with the relevant local authority officer to agree suitable procedures where necessary for temporary closure or diversion of any publically accessible route and any associated measures to ensure the safety of the general public.
- Heavy goods vehicles and light goods vehicles will also be used during construction. HGV movements will normally take place during the Core Working Hours. Where practicable, deliveries of construction materials will be timed to fall outside of traditional peak traffic periods

5.10 Waste and materials

Management of waste streams

All waste streams will be managed according to the principals of the waste hierarchy. Figure 5 below indicates the different stages of the waste hierarchy with the corresponding site specific waste management measures.

Waste will be segregated into individual waste containers (metal, timber, inert etc.) and monitored in relation to type and weight, enabling the onsite recycling of materials to be maximised. All containers shall be coverable to prevent windblown waste issues. All waste should be stored appropriately, including:

- Using suitable containers for each waste type, e.g. hazardous waste drums;
- All containers will labelled with the waste description and EWC code;
- Hazardous wastes will be stored on hard standing or within a temporary bund away from sensitive receptors and site traffic;
- No waste storage locations shall be established within 10 meters of the watercourses around the NGED works;
- No waste storage locations shall be established within 10 meters of residential receptors;
- No mixing of hazardous and non-hazardous materials is permitted under any circumstances; and
- No burning of wastes at site.

Monitoring

NGED reserve the right to undertake audits and inspections of waste management activities to ensure compliance with the requirements of this CEMP.

The Contractor will maintain a register of all waste loads leaving the site which will provide an audit trail for compliance purposes and to facilitate monitoring and reporting of waste types, quantities and management methods.

Duty of Care

Any waste leaving the site will be accompanied by appropriate duty of care documentation in line with the relevant statutory requirements for waste transfer and hazardous wastes (as appropriate). Duty of care documentation will be retained by the contractors in line with statutory requirements. Site operatives shall undertake checks of the Waste Transfer Notes and Hazardous Waste Consignment Notes to ensure waste is being managed in line with current waste legislation.

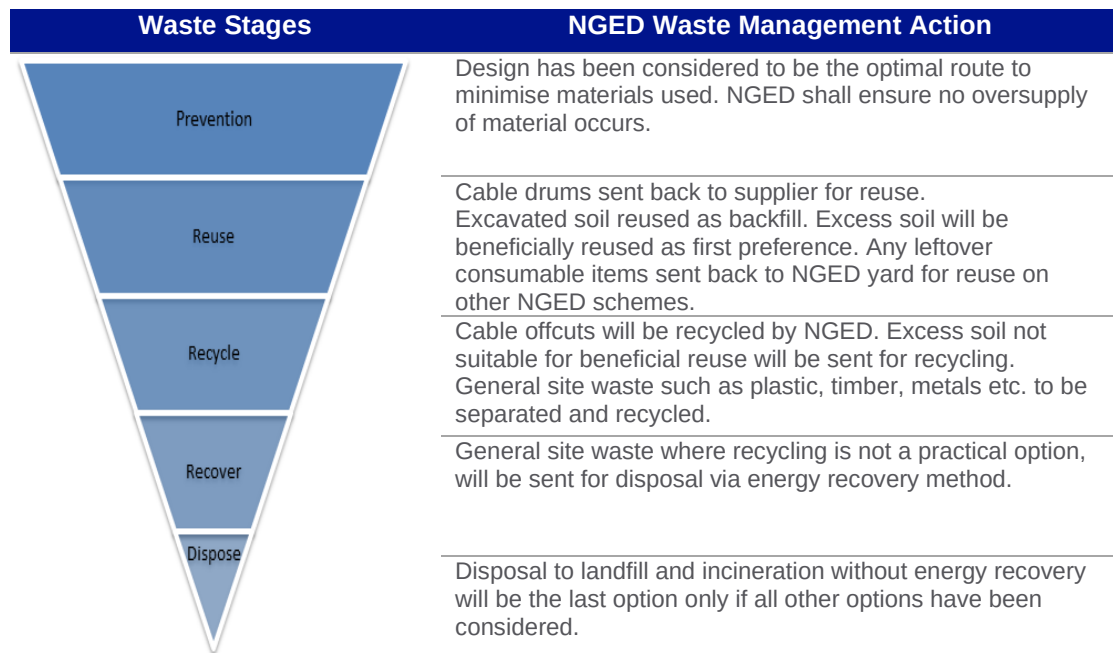


Figure 4: Waste hierarchy

5.11 Water resources and flood risk

The Contractor will produce a water management plan to detail the methods and locations for abstraction and discharge requirements, as well as methods for mitigating the risk of water runoff.

Water Resources

The NGED Contractor shall identify all watercourses, drains and potential conduits and where necessary, measures shall be taken to minimise direct sediment and silt-laden runoff from the working site into watercourses by implementing the following measures applicable to site specific conditions:

- Silt fencing: A geotextile barrier installed on stakes and buried into the ground to provide a barrier to protect sensitive receptors such as adjacent watercourses. The fence captures and slows the flow of silty water, allowing the fence to filter out the silt particles.
- Buffer strips: Retained areas of vegetation between the work site and sensitive receptors, to allow natural drainage and protection. These will be demarcated on site.

- Silt bags and filters: For water to be pumped into, during dewatering operations, to provide filtration of silt particles. They can also be used to accept a gravity feed from a settlement lagoon or drainage pipe.
- Settlement tanks: Use of purpose-made tanks such as Siltbuster, that allow silt-laden water to be pumped through at controlled rates, to allow settlement and discharge of clear water downstream.

Any crossing of a watercourse may require prior consent from NRW or the LLFA; this will be obtained prior to any works being carried out. Any culverted crossing will be designed to ensure continuity of flow and will not restrict flow or increase flood risk.

No discharges shall be made to ground or watercourses without the prior consent of NRW and the method of any such discharges shall be in accordance with NRW requirements.

A “permit to pump” system for dewatering of excavations shall be implemented to ensure that no unauthorised pumping occurs. If any dewatering under permit is required then the details, including location of any discharge should the water not be removed from site by tanker, shall be agreed with NRW. If not removed from site then discharge shall be well away from sensitive receptors or conduits for silt laden water. Appropriate silt mitigation shall be installed and maintained at the outfall as required.

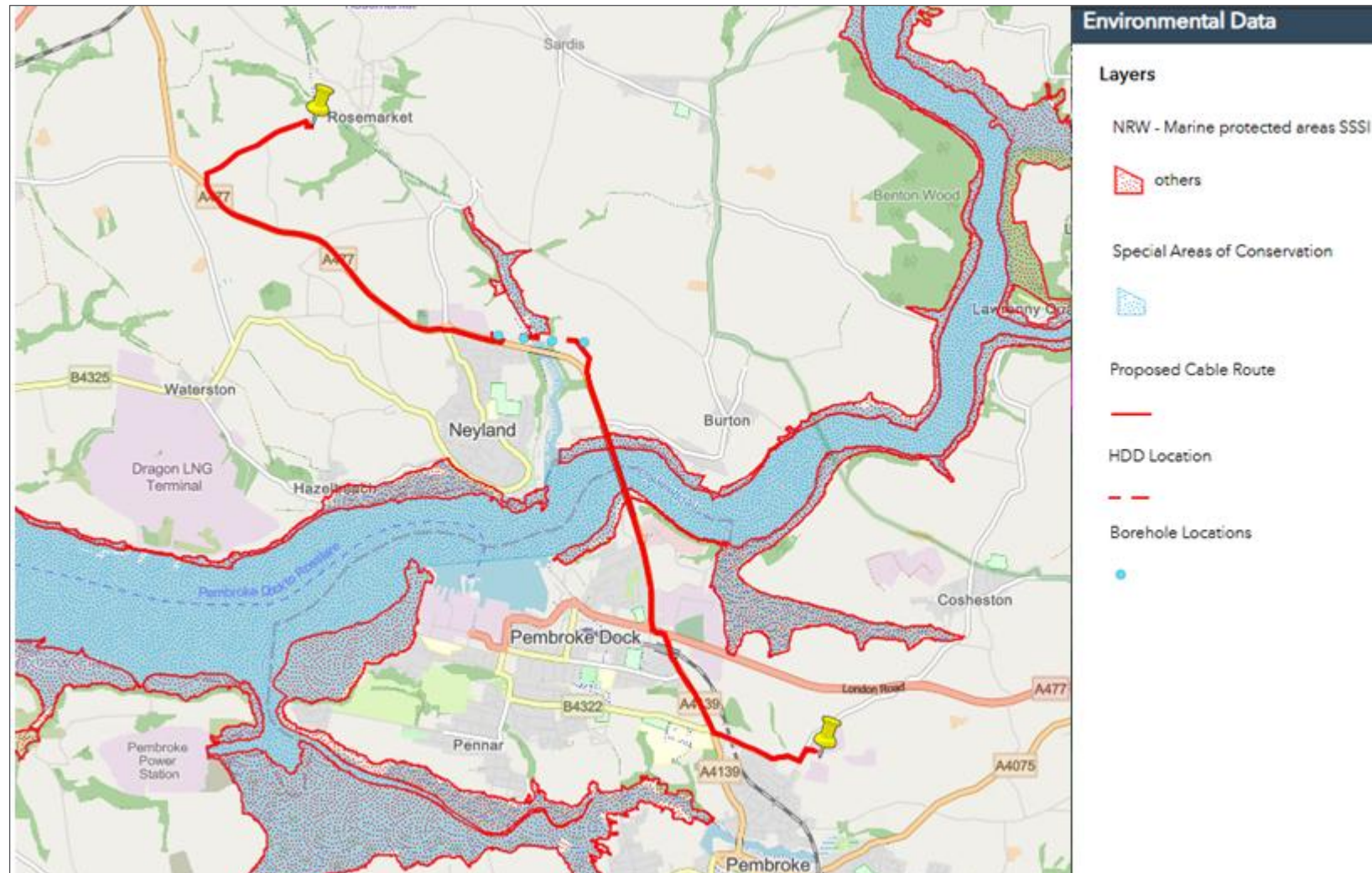
The Contractor will carry out daily visual inspections of all watercourses, drainage outfalls and pumping activities, particularly during periods of inclement weather.

Flood Risk

The Contractor shall be aware of the flood risk to the works area which are partly within Flood Zones. The following flood risk mitigation measures will be implemented by the contractor:

- Flood risk will be included in the contractors RAMS and toolbox talks;
- the Contractor will register with the NRW's flood warning service;
- soil stockpiles will be placed outside of flood risk areas;
- site establishment areas will be located outside of the flood risk areas
- flood risk assessment will be completed as part of the consent application to NRW;
- no water will be discharged to ditches, watercourses, drains or soakaways;
- Ensuring fencing in areas at risk of flooding is permeable to floodwater, unless otherwise agreed with NRW.

APPENDIX A– Designated Sites



APPENDIX B - Flood Zone 3

