Paul Downing & ASSOCIATES LTD

Paul Downing & Associates Ltd

H5 Site Condition Report for Western Power Distribution, Llanfihangel-ar-arth, Pencader, Carmarthenshire, SA39 9HT

Version 1.0

In support of Application REF: WPD Llanfihangel Depot

Title	Name	Date	Signature
Author	David Walker	22 March 2016	
Reviewed	Paul Downing	30 March 2016	
Authorised	Paul Downing	30 March 2016	

Table of Contents

Executive Summary

Paul Downing & Associates Ltd was commissioned to produce a site condition report (SCR) in support of a permit application on behalf of Western Power Distribution's Llanfihangel-ar-arth, Pencader, Carmarthenshire, SA39 9HT depot under the Environmental Permitting Regulations 2014.

The purpose was to identify the baseline conditions with regards to soil and groundwater contamination by carrying out a site visit, review of literature and additional relevant data and reports. The site walkover was carried out on 15 March 2016 by Paul Downing.

The depot is located west of the B4459 road that runs from Llanfihangel to Pencader approximately 3.6km south of the site. It is located at National Grid Reference: (SN) 245576 239627.

The area under assessment covers 0.01 Hectares of the Western Power Distribution Depot and includes a former network equipment storage area in a masonry bund. The surrounding land use is primarily agricultural and residential.

The site has a foul and surface water drainage system in place and there are pollution mitigation measures such as spill kits, gulley pots and interceptor chambers on site. A hydrophilic bund pumping system is in place that discharges to a separator prior to entering the surface water system and presumed soakaway.

A review of the geology, hydrogeology, hydrology and environmental constraints such as Sites of Special Scientific Interest was carried out.

The geology beneath the site comprises superficial glacial Till deposits overlying the Rhyddlan Mudstone and Sandstone Formation classified as an unproductive aquifer overlying a Secondary B Aquifer. There is one Site of Special Scientific Interest within 2000m and the same river is designated a Special Area of Conservation north of the site.

The site remained agricultural land until at least 1981 where it underwent development prior to 2002. There have not been any significant changes to the land use over time and the surrounding area remained heavily dominated by agriculture.

A source pathway receptor qualitative risk assessment was carried out based on the information collected and the current operations on site to understand any potentially complete SPR Linkages on site.

Two potential sources have been suggested for assessment and these were Historic/Legacy contamination in the sub surface and spills and loss of primary containment. Both of these potential SPRs and their associated linkages are considered low to medium risk due to the lack of nearby receptors or mitigation measures such as Environmental Management Plans, spill kits and PPE.

The recommendations have been made to mitigate any potential risks arising from land contamination beneath the site and catastrophic spills and leaks that may come into contact with construction workers in the future.

This report has been produced solely for H5 SCR purposes of supporting a permit Application for Western Power Distribution. Paul Downing & Associates Ltd is not liable for any other use of its contents other than those listed in this report nor for use by any other 3rd party than Western Power Distribution.

1 Introduction

1.1 Scope of Work

Paul Downing & Associates Ltd was commissioned to produce a site condition report (SCR) in support of a permit application on behalf of Western Power Distribution's Llanfihangel-ar-arth, Pencader, Carmarthenshire, SA39 9HT depot under the Environmental Permitting Regulations 2014.

The aim of this report was to identify the baseline conditions with regards to soil and groundwater contamination by carrying out a site visit, review of literature and additional relevant data and reports.

1.2 Background

Natural Resources Wales have requested that a permit application be submitted for the area of land identified in Figure 1, Annex A. The area of land under application is used for the storage of former network equipment including transformers.

The report has been written in accordance with Natural Resources Wales H5 guidance for producing a SCR and comprises a site walkover, review of previous reports, Groundsure data (GS2825848) and involved discussions with the Natural Resources Wales. This report has also been completed in accordance to BS 10175:2011 – "Investigation of Potentially Contaminated Sites", code of practice and CLR 11 – "Model Procedures for the Management of Contaminated Land".

The work undertaken for this SCR comprises:

- a site walkover assessment;
- a review of the historical land uses associated with the site to assess the potential for ground contamination;
- a review of the environmental setting to assess the sensitivity of the surrounding environment to contamination/pollution;
- consultation with the regulatory authorities to establish whether there are any significant environmental issues that may impact upon the site;
- a review of the "Groundsure" Site check report dated 16/03/2016 ref GS2825848; and
- A review of additional publically and commercially available reports and data sets.

The environmental risk assessment presented within this report has been prepared having regard to the source-pathway-receptor model introduced under Part IIA of the Environmental Protection Act 1990 and associated guidance on contaminated land published by the Department of Environment, Food and Rural Affairs. The methodology is essentially a qualitative assessment based on the identification and evaluation of potential 'source-pathway-receptor pollutant linkages'. On the basis of this risk assessment, consideration has been given to the potential for the site to be designated as 'contaminated land' (under the local authority contaminated land inspection strategy) as defined in Part IIA of the Environmental Protection Act 1990.

This report has been produced solely for H5 SCR purposes of supporting a permit Application for Western Power Distribution. Paul Downing & Associates Ltd is not liable for any other use of its contents other than those listed in this report nor for use by any other 3rd party than Western Power Distribution. A statement of limitations is presented at the end of this report.

2 Site Setting

2.1 Site Location

The Western Power Distribution Depot site is located at Llanfihangel-ar-arth, Pencader, Carmarthenshire SA39 9HT south of Llanfihangel-ar-arth west of the B4459 road that runs from Llanfihangel to Pencader approximately 3.6km south of the site. It is located at National Grid Reference: (SN) 245576 239627.

The area under consideration is the former equipment store located west of the main depot building.

Figure 1 in Annex A shows the outline of the area under assessment.

The site is typically flat and covered with hard standing, the area under application makes up approximately 0.01 Hectares of the entire Western Power Distribution site at Llanfihangel.

2.2 Surrounding Land Use

The current surrounding land use off-site is agricultural and domestic within some industry nearby in the form of transport, storage and delivery businesses north east and south west of the site.

2.3 Site Layout - Operations and Infrastructure

The following observations were made during the site walkover carried out on 15 March 2016.

The former equipment store holds several transformers and associated equipment in a masonry bund that appeared to be in excellent condition. There was no evidence of staining in the area and there was hard standing throughout the site.

Water captured in the bunded area is controlled using a Andel P.P.L Bundguard Unit within a sump that pumps water to manhole 17 that leads to the site interceptor prior to discharging to a presumed soakaway. The rest of the site's surface water is managed through land drainage ditches, surface water gulley pots and open ditches. There is a foul water system connecting to the Welsh Water Main Sewer System running north to south down the B4459 road.

Spill kits were present on site at the time of the visit and the Llanfihangel Depot Drainage Plan is shown in Figure 2 Annex A.

3 Site History

The site is located under the Llanfihangel Rhydithon Community Council Planning Authority[1] and a review of planning applications and historical maps of the site are described below and presented in Annex C.

3.1 Planning History

No planning history is available online for the site and no other planning applications have been identified associated with the SA39 9HT postcode.

3.2 Historical Mapping

Historical maps have been collated dating back to 1888 and these are presented in Annex C.

Based on the historical maps a summary of the site's key development over time is given in Table 2.1:

[1] https://llanrhydithon.wordpress.com/planning/

Table 2.1: Summary of key developments shown in historical maps

Date	*Key Features*
1888/1889	The site is made up of an agricultural field with the Manchester and Milford Railway Line running within 50m of its northern and western boundary. There is a school identified south east of the site and a road defining the eastern field boundary (B4459). There are at least six domestic properties located less than 100m east of the site.
1906	No significant changes. Springs have been identified south of the site north of Cross Hands and Crosshill.
1977/1981	There has been a depot built north east of the site and other residential plots have become occupied between 1964 and 1981. The railway is now described as dismantled and there have been no significant changes to the site itself during this time.
2002	The site is now present and the layout associated with the access tracks can be seen. The springs and sinks associated with the surrounding area ae clearly marked on the 2002 OS Map showing flow towards the north.
2014	No significant changes from the 2002 naps have occurred.

The site remained agricultural land until at least 1981 where it underwent development prior to 2002. There have not been any significant changes to the land use over time and the surrounding area remains heavily dominated by agriculture.

3.3 Potentially Contaminative Land Uses

There are three records of potentially contaminative current land uses and industrial processes within 250m of the site. These refer to the container and storage industrial facilities located 22m, 110m north east and 240m south west.

There are 39 records of potentially contaminative historical land uses identified within 500m. These are presented in Annex D and Section 1.1 of Groundsure Report GS2825848. The historical contaminative uses are based on the historical mapping presented in Annex C and include the depot itself, railway cuttings and a graveyard 248m north of the site.

The area has not had a long industrial history and significant contamination would not be anticipated as a result of the identified land use surrounding the site.

4 Environmental Setting

4.1 Geology

The geology has been determined from the British Geological Survey Map App[2] and the Groundsure Report, Annex D, which is derived from the BGS 1:50,000 Digital Geological Map of Great Britain.

The geology can be described as superficial deposits overlying bedrock. The superficial deposits are made up from Till, Devensian - Diamicton formed up to 2 million years ago in the Quaternary Period. These rocks were formed in cold periods with Ice Age glaciers scouring the landscape and depositing moraines of till with outwash sand and gravel deposits from seasonal and post glacial meltwaters.

The bedrock underlying the Till is the Rhyddlan Formation, Llandovery Rocks undifferentiated, described as an interbedded Mudstone and Sandstone. Deposited approximately 428 to 444 million years ago in the Silurian Period these rocks were formed in deep seas from infrequent slurries of shallow water sediments which were then redeposited as graded beds.

The geology descriptions appear consistent with the documented geology in Section 5.0 of Annex D GS2825848 Groundsure Report.

[2] http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html

4.2 Hydrology & Surface Water Features

There are seven Detailed River Networks recorded within 500m of the site. These relate to Tertiary Rivers, Culverts and one Primary River the Afon Teifi located 491m north of the site.

The two springs identified in the historic mapping are designated as Tertiary Rivers and are formed where a Secondary A aquifer comes into contact with the unproductive strata of the Rhyddlan Formation forcing groundwater to surface at this boundary.

Biological data was collected between 2005 and 2009 and represents the water quality in terms of 83 macroinvertebrates, some of which are sensitive to pollution. The results are consistently graded as B 1323m north west of the site.

Chemical water quality data is also reported 1323m north west of the site and the results are all graded at A "Very Good" and B throughout the four year record.

There is one active surface water abstraction 1792m north west of the site that is used for hydroelectric power generation. It has operated since 1994 and allows the abstraction of 50,000m^3/day and 180,000,000m^3/year.

The River Networks Map is shown in Figure 3 Annex A.

4.3 Hydrogeology

The superficial geology on site is classified as an unproductive aquifer considered to have low permeability and negligible significance for water supply or river base flow. The bedrock is classified as a Secondary B Aquifer consisting of predominantly lower permeability layers which may store/yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These aquifers are generally the water-bearing parts of the former non-aquifers.

There are five historical records of groundwater abstraction licences within 2000m of the site. Four were used for general farming and domestic water and one for commercial, industrial and public services. The closest abstraction is located 642m east and commenced abstraction in 1965 under Licence No: 22/62/02/0009, few other details are available for this source.

There are no source protection zones (SPZs) within 500m of the site. The nature of the geology means that any pollutants are unlikely to penetrate the soil layer because water movement is largely horizontal and as a result is designated as having a Low Leaching Potential, the depth to groundwater is not known.

4.4 Flood Risk

Surface Water Flooding

The site is not present in any Natural Resources Wales designated Flood Zones 2 or 3.

The Natural Resources Wales RoFRaS database provides an indication of river and coastal flood risk at a national level based on a 50m grid with the flood rating at the centre of the grid calculated. The data considers the probability that the flood defences will overtop or breach by considering their location, type, condition and standard of protection.

The RoFRAS score for the site is 'Very Low.'

Groundwater Flooding

The British Geological Survey (BGS) has identified that the superficial deposits have a limited potential to flood as a result of groundwater emergence. This potential to flood at the surface and the geological conditions in the area mean the groundwater flooding hazard should be considered in all land-use planning decisions.

It is recommended that other relevant information e.g. records of previous incidence of groundwater flooding, rainfall, property type, and land drainage information be investigated in order to establish relative, but not absolute, risk of groundwater flooding.

The confidence of groundwater flooding occurring has been categorised as 'High'. The confidence rating is on a threefold scale - Low, Moderate and High. It provides a relative indication of the BGS' confidence in the accuracy of the susceptibility result for groundwater flooding. This is based on the amount and precision of the information used in the assessment.

4.5 Environmental Sensitivity

There are several designated environmentally sensitive sites within 2000m of the site including the Afon Teifi River Site of Special Scientific Interest (SSSI) located 477m north. The river is also classified as a Special Area of Conservation (SAC).

There are 69 records of Ancient Woodlands within 2000m of the site and the closest is 373m west at Allt Tan-Fforest.

None of the following environmentally sensitive designations exist within 2000m of the site:

- Area of Outstanding Natural Beauty (AONB);
- National Nature Reserves (NNRs);
- Special Protection Areas (SPAs);
- RAMSARs;
- Environmentally Sensitive Areas (ESAs);
- Nitrate Sensitive Areas (NSAs);
- World Heritage Sites; or
- Greenbelt.

The designations that are present are shown in Annex A, Figure 4 and presented in Annex D.

5 Regulatory Setting

The site is currently used for storage of waste oils and former equipment that has been recovered from the network and brought to site.

5.1 Environmental Permits

There are no records of IPC, IPPC or other formal authorisations registered within 500m of the site and no enforcements are registered with this site.

5.2 Discharge Consents & Industrial Processes

Two licensed discharge consents are located within 500m of the site; both 497m north of the site in relation to the sewage treatment works. The first consent was revoked in 2009 and the second commenced in January 2010 for the discharge of final treated sewage effluent.

5.3 Landfill and Waste Licences

There are no records held by Natural Resources Wales, the Local Authority or the British Geological Survey relating to licensed waste sites within 1500m of the site.

5.4 Records of Pollution Incidents & Contaminated Land

Pollution incidents are recorded by Natural Resources Wales on the National Incident Recording System (NIRS) and given a category rating based on their severity of impact caused to water, land and air.

There has been one recorded List 2 pollution incident 243m north east of the site relating to minor impacts on land and water in November 2003, the pollutant was described as Inert Materials and Waste derived from construction and demolition materials and waste. There are no records of any List 1 pollution incidents and no sites determined as Contaminated Land under the Part 2A Contaminated Land Regulations part of the Environmental Protection Act 1990 are located near the site.

5.5 Petroleum Licences

There are no records of petrol filling stations within 500m.

5.6 Mining

There is no evidence of coal mining activities within 75m of the site. The Groundsure Report has identified the potential for non coal mining activities on site and these are associated with minor mining of limited extents in relation to mineral veins at Berwyn Hills.

The report explains that *"the rock types present in these areas are such that small mineral veins may be present on which it is possible that small scale mining has been undertaken and/or it is possible that limited underground extraction of other materials may have occurred. All such occurrences are likely to be of minor localised extent and infrequent. It should be noted, however, that there is always the possibility of the existence of other sub-surface excavations, such as wells, cess pits, follies, air raid shelters/bunkers and other military structures etc. that could affect surface ground stability but which are outside the scope of this dataset."*

6 Review of Previous Reports and Baseline Soil Conditions

No site investigations or further information relating to ground conditions was available or reviewed as part of this report.

7 Environmental Risk Assessment

7.1 Risk Assessment Framework

The following environmental risk assessment has been prepared having regard to the source-pathway-receptor model introduced under Part IIA of the Environmental Protection Act 1990 and associated guidance on contaminated land published by the Department of Environment, Food and Rural Affairs.

The methodology is essentially a qualitative assessment based on the identification and evaluation of potential 'source-pathway-receptor pollutant linkages'.

An Environmental Risk Assessment involves assessing the likely probability and consequence of a Pollutant Linkage existing and determining a consequent level of risk. A pollutant linkage will only be

present where the sources pathways and receptors are all present. For a risk to exist all three of the following components must be present:

- Source of contamination;
- Pathway for the contaminant to move from source to receptor; and
- Receptor that could be affected by the contaminant.

The following sections identify the potential sources, pathways and receptors present on site and assess the potential linkages.

7.2 Potential Sources

The following table identifies the potential sources of contaminants on the site and qualitatively assesses their significance on a scale of 1 (Low) to 5 (High) versus the likelihood on a scale of 1 (Unlikely) to 3 (Very likely).

The risk score is the product of the significance and likelihood has been categorised as follows:

1-4 = Low Potential Risk

5-10 = Medium Potential Risk

11-15 = High Potential Risk

Table 6.1: Potential Sources On Site

ID	*Potential Source*	*Potential Significance (1 Low 5 High)*	*Likelihood (1 Unlikely 3 Very Likely)*	*Risk Score*
1	Unidentified Historic/Legacy contamination in the sub surface	2	2	4
2	Leaky drums and equipment over time	2	2	4
3	Catastrophic spills of chemicals/solvents/hydrocarbon fuels and loss of primary containment	2	2	4

The potential sources are considered low risk due to the low sensitivity of the groundwater environment, information provided in the historical mapping, the Annex D Groundsure Report and observations made on site during the walkover.

7.3 Potential Pathways

The following table identifies the potential pathways that exist on site.

Table 6.2: Potential Pathways On Site

ID	*Potential Pathways*
1	Vertical leaching through the soils
2	Aquifer flow
3	Dermal contact and ingestion during excavation without PPE
4	Inhalation during excavation/wind blown
5	Drainage channels and utility trenches

7.4 Potential Receptors

The following table identifies the potential receptors that have been identified on site and in the surrounding area.

Table 6.3: Potential Receptors

ID	*Potential Receptors*
1	Site employees at surface
2	Construction workers (excavation crews)
3	Surface water features including ecosystems
4	Groundwater beneath the site

7.5 Potentially Complete SPR Linkages

By combining the information in the source pathway receptor tables the potentially complete linkages have been assessed and are shown in Table 6.4. There are a total of 12 potentially complete linkages, this is considered conservative as no significant impacts have been identified on the site.

Table 6.4: Review of all SPR Linkages identified on site

	Potential Receptors				
Potential Sources		***Site employees at surface***	***Construction workers (excavation crews)***	***Surface water features including ecosystems***	***Nearby Groundwater***
	Unidentified Historic/Legacy contamination in the sub surface	Inhalation	Inhalation, ingestion, dermal contact	Shallow aquifer flow, drainage channels	Vertical leaching and migration through strata to groundwater
	Leaky drums and tanks holding transformer oils. Transformers and network equipment leaking/residual oils	Inhalation, ingestion, dermal contact	Inhalation, ingestion, dermal contact	Permeable hard standing, shallow aquifer flow, drainage channels	Permeable hard standing, vertical leaching and migration through strata to groundwater
	Catastrophic spills of chemicals/solvents/hydrocarbon fuels and loss of primary containment	Inhalation, ingestion, dermal contact	Inhalation, ingestion, dermal contact	Permeable hard standing, shallow aquifer flow, drainage channels	Permeable hard standing, vertical leaching and migration through strata to groundwater

Table 6.5: Summary of potentially complete SPR Linkages and rationale for risk rating identified on site

Source	Pathway	Receptor	Risk	Rationale
Unidentified Historic/Legacy contamination in the sub surface	Inhalation of vapours	Site Workers Construction Workers	Low/Medium	There is the potential for unaccounted legacy contamination in the subsurface. By using the correct PPE and EMS this potentially medium risk should be mitigated.
	Dermal contact and ingestion	Construction Worker	Low/Medium	There is the potential for unaccounted legacy contamination in the subsurface. By using the correct PPE and EMS this potentially medium risk should be mitigated.
	Shallow aquifer flow, drainage and utility trenches discharging to springs and nearby rivers	Surface Water Features including ecosystems	Low	The vertical seepage pathway is cutoff by the engineered hard standing, where competent, therefore leachate production is limited.
	Vertical leaching through soil profile	Nearby Groundwater	Low	The vertical seepage pathway is cutoff by the engineered hard standing inside a building, therefore leachate production is limited.
Spills, leaks and loss of primary containment – cumulative effects/Catastrophic spills.	Inhalation of vapours	Site Workers Construction Workers	Low	There may be occasions when chemicals/hydrocarbons are brought onto site and a loss of containment may occur. With a robust incident response and management system in place including the use of the correct PPE the risk is considered low.
	Dermal contact and ingestion	Construction Workers	Low	Loss of containment of chemicals/hydrocarbons and the cumulative effect of small-scale drips and leaks over time with a history of contaminative land uses may result in an impacted soil. With a robust incident response and management system in place including the use of the correct PPE the risk is considered low.
	Discharge points from the site or catastrophic overland runoff	Surface Water Features including ecosystems	Medium	By having hardstanding on site and an incident management plan in place this risk is minimised. Equipment failure of the bund pumping system is a potential risk that could discharge bund water into the surface water system, therefore a medium risk has been assigned.
	Vertical leaching through soil profile	Nearby Groundwater	Low	By having competent hard standing and an incident management plan in place this risk can be minimised. With a robust incident response and management system in place including the use of the correct PPE and spill kits the risk is considered low.

8 Conclusion & Recommendations

8.1 Conclusions

Overall the site would be given a classification of low to medium risk based on the existing processes on site.

The site remained agricultural land until at least 1981 where it underwent development prior to 2002. There have not been any significant changes to the land use over time and the surrounding area remains heavily dominated by agriculture.

There is always the potential for impacted material to be present beneath the site however there has not been a long history of nearby potentially contaminating land uses.

The former equipment store is situated on hard standing and has a pumped collection system to manage bund water. In the event of equipment failure there is a chance that impacted bund water could enter the surface water drainage system and eventually discharge into the environment. The removal of the connection to the pumped system from the former network equipment store would greatly reduce the risk of fugitive emissions entering the environment in the event of equipment failure or catastrophic spills.

By implementing the correct environmental management systems on site the potential impacts associated with continued operation would not be considered significant and unlikely to pose a threat to the existing site condition.

8.2 Recommendations

The following recommendations have been made to enable the potential impacts of a completed SPR linkage to be reduced and in some cases eliminated.

1. *Personal protective equipment (PPE) and due care and attention during excavation or earthworks* - To reduce the potential for dermal contact, ingestion and/or inhalation of potential contaminants all site workers involved in excavation of soils should wear the correct PPE as a precaution. Dust suppression could also be employed as an additional protective system including surface runoff management.
2. *Removal of connection to surface water drainage from the former equipment store area* – Removing the drainage connection from the former network equipment store would reduce the risk of fugitive emissions entering the environment in the event of equipment failure or catastrophic spills.
3. *Hard Standing* - Undertake regular inspections of the hard standing and masonry bund. Areas showing signs of wear and tear should be repaired and joints sealed as soon as feasibly possible. The hard standing provides the first level of environmental protection in the event of a spill and also minimises infiltration of precipitation, therefore, reducing the risk of mobilising any existing contamination in the sub surface; and
4. *Pollution Prevention Management Systems* - A pollution management system should be put in place (if not already existing) to ensure staff on site are able to manage a potentially environmentally damaging incident as well as adopting best practice when handling potentially contaminating materials. This includes using drip trays/secondary bunds, on-site spill kits, installation of valves on the surface water drainage system to close off the system in the event of a spill and training on control of the drainage system.

9 Statement of Limitations

This report was prepared in accordance with the scope of work outlined within this report and is subject to the applicable cost, time and other constraints. Paul Downing & Associates Ltd performed the services on behalf of the Client in a manner consistent with the normal level of care and expertise exercised by members of the environmental profession. No warranties, expressed or implied, are made.

Except as otherwise stated, Paul Downing & Associates Ltd's assessment is limited strictly to identifying the specified environmental conditions associated with the subject Site and does not evaluate structural or geotechnical conditions of any part of the Site (including any buildings, equipment or infrastructure).

All conclusions and recommendations made in the report are the professional opinions of the Paul Downing & Associates Ltd personnel involved with the project and, while normal checking of the accuracy of data has been conducted, Paul Downing & Associates Ltd assumes no responsibility or liability for errors in data obtained from such sources, regulatory agencies or any other external sources, nor from occurrences outside the scope of this project.

Paul Downing & Associates Ltd is not engaged in environmental consulting and reporting for the purpose of advertising, sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity or investment purposes.

This report has been prepared for the sole use of Western Power Distribution. The report may not be relied upon by any other party without the express written agreement of Paul Downing & Associates Ltd. The provision of a copy of this report to any third party is provided for informational purposes only and any reliance on this report by a third party is done so at their own risk and Paul Downing & Associates Ltd disclaim all liability to such third party to the extent permitted by law. Any use of this report by a third party is deemed to constitute acceptance of this limitation.

This report does not constitute legal advice.

10 Annexes

ANNEX A Figures

Figure 1 Site Boundary and Location

Figure 2 Brecon Environmental Management Map

Figure 3 Surface Water Features

Figure 4 Environmental Designations

ANNEX B Photolog

ANNEX C Historical Maps

ANNEX D Groundsure Report

ANNEX A Figures

Figure 1 Site Boundary and Location

Figure 2 Environmental Management Plan

Figure 3 Surface Water Features

Figure 4 Environmental Designations