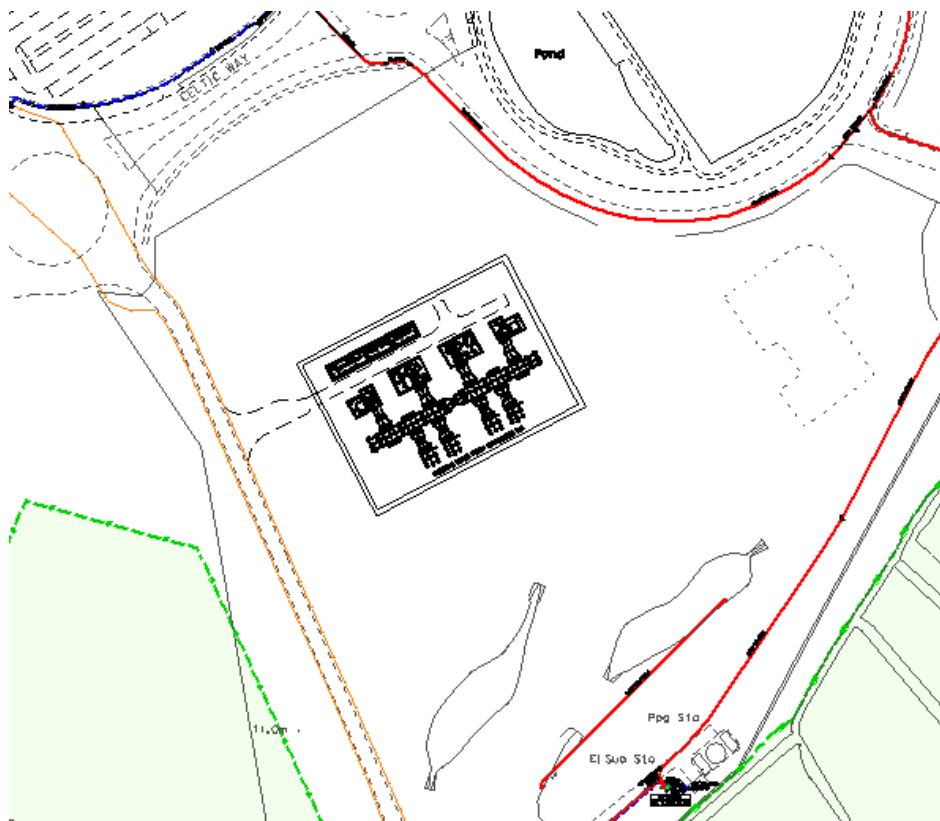


Construction Environmental Management Plan December 2024



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Appendix E – Plan of Site Storage NGED 001

Background

1.1 Introduction

- 1.1.1 National Grid Electricity Distribution (NGED) is the electricity distribution network operator for the South West, Midlands and Wales. The Welsh Government obtained planning permission from Newport City Council (NCC) to build a new 132kv / 33kv / 132kv / 11kv substation located at Imperial business park, Coedkernew, Newport. The site has been prepped for development of the BSP by Walters Group Ltd.
- 1.1.2 This Construction Environmental Management Plan (CEMP) has been prepared to outline the potential environmental impacts of the proposed construction works and the mitigation measures which will be used to minimise these whilst complying with GP5 of the Newport Local Development Plan 2011-2026.

1.2 Site Setting

- 1.2.1 The proposed substation will include 2no. 132kv / 33kv transformers, 2no. 132kv / 11kv transformers, a new substation building measuring approx. 40.00m x 6.00m situated within a compound measuring approximately 96m x 70m. Topsoil and Subsoil has been stripped on the proposed area (by others) it has been handled and stored for future use in habitat creation (by others).

1.3 Description of Proposed Works

- 1.3.1 The proposed development will include a new substation electrical compound approximately 96m x 70m with associated vehicle/pedestrian access, drainage works, as well as a new substation building approx. 40m x 6m with welfare facilities.
- 1.3.2 Construction materials will be delivered to the dedicated site storage, via the existing road network, as outlined within the Construction Phasing and Logistics Methods Statement (293651-ARP-XX-002) approved through the application to discharge condition 4 (application ref:24/0528). A temporary storage area within the construction site/substation site will act as a base and for storage. There will be no requirement to undertake works for any temporary bases on site, hardcore will be put down on site a base to work from and install a contractor compound/office set up. See plan site storage Appendix E
- 1.3.3 Construction compounds will be located within the site boundary as per plan site storage, Appendix E. Tracked excavators will be used during construction works. Storage of materials will only be permitted within an area agreed with site management, materials must be stored neatly and stacked appropriately and accessible when required for use. Skips will be covered and enclosed if not in use to minimise the spread of dust. Upon completion of the works all materials and waste will be removed from site and the site shall be kept in a tidy condition.

- 1.3.4 All waste generated will be dealt with in accordance with our Principal Contractors environmental plan and waste management plan and CDM, all waste that is generated by the works associated with the construction of the substation

Underground Section

- 1.3.5 All underground works to be finished off with gradient sloping to land drain that is to discharge to a manhole installed by others for discharge into pond

Construction Activity

- 1.3.6 The duration of the construction of the new substation compound will be approx. 18 months.
- 1.3.7 The construction works will be undertaken by our contractors under the CDM regulations and supervision of NGED and also by NGED personnel
- 1.3.8 Aggregate imported into the BPS will be to DMRB standards for highways and sourced locally to be delivered by suitable vehicles
- 1.3.9 Drainage materials will be to DMRB standards for highways. Covers and Frames to be BS EN 124 D400 kitemarked. All drainage to be installed with the pipe and bedding combinations.
- 1.3.10 Concrete will be delivered in purpose built concrete wagons and poured directly at point of use via concrete pump. To prevent concrete grout run off entering any watercourse, plan will be cleaned at a designated bunded wash out area located a minimum of 20m away from any water course. All powders and resins to be stored in sealed containers, bags or silo as per manufactures recommendations.
- 1.3.11 Piling with not be required during construction due to ground conditions.

1.4 Purpose of the CEMP

- 1.4.1 A CEMP is a tool for managing the environmental impacts of a development during the post consent phase and is often produced at the request of a planning authority as a condition of planning consent. It is to ensure that environmental good practices are adopted throughout construction, as well as ensuring that mitigation measures are being effectively implemented and maintained during construction. It also aims to ensure prompt response if any unacceptable adverse impacts are identified, and provides means of mitigating for impacts that may not be anticipated or become apparent until construction is underway.
- 1.4.2 The CEMP is a live working document which will be printed, e-mailed and made available to all on-site personnel as required.
- 1.4.3 CEMP has been produced to demonstrate that NGED understands the potential impact of the works with regards to environmental impacts of a development and to put in place a mechanism to ensure that the proposed mitigation outlined in the documentation approved by NCC is implemented appropriately.

Scope

This CEMP communicates the following:-

- i. Contractual and Legal Requirements (Section 3)
- ii. Key roles and responsibilities and methods of communication (Section 4)
- iii. Environmental Training and Awareness (Section 5)
- iv. Site environmental aspects register (Section 6) and
- v. Monitoring (Section 7)

- 1.4.4 Revisions to this CEMP shall be agreed and approved by the appointed NGED Project Manager and recorded. The plan shall be continually reviewed to take into account additional environmental information encountered during the design and construction phases. It shall also allow for the inclusion of requirements and amendments that may arise from legitimate concerns of Third Parties.
- 1.4.5 All personnel and sub-contractors working on the project shall perform their duties with the requirements of the CEMP. The site Team shall report regularly to the Project Manager on the status and effectiveness of its implementation.

2 Legal and Regulatory Requirements

2.1 Underground Section

- 2.1.1 All underground works to be finished off with gradient sloping to land drain that is to discharge to a manhole installed by others for discharge into pond
- 2.1.2 Regulatory Compliance is the minimum required of the CEMP and NGED Environmental Policy. The measures taken are designed to achieve regulatory compliance as a minimum and additionally, to record with best practice, where relevant.

- i. Any legislative changes shall be disseminated to the project manager immediately, after which the method statements of any affected operations shall be changed accordingly.

Consents and Licences shall be kept in the project file.

2.2 **Guidance**

The CEMP is intended to satisfy the principles of the International Environmental Managements System (EMS) Standard ISO 14001. The appointed Contractor will ensure that the CEMP for the proposed development complies with the Contractor's own EMS

The CEMP will be developed in accordance with relevant best construction practice guidance, including:-

- Guidance for Pollution Prevention (GPP) 1-281, in particular:
- GGP 2 Above ground oil storage tanks (2018)
- GPP 5 Works and Maintenance in or near water (2018)
- GPP 6 Working on Construction and Demolition Sites (2023)
- GPP 21 Pollution incident response planning (2021)
- GPP 22 Dealing with spills (2018)
- CIRIA Environmental Handbook for building and civil engineering Projects (2000)

2.3 **Developments**

No development shall take place until the applicant, or their agents or successors in title, has secured implementation of a programme of archaeological work in accordance with that outlined in 'Celtic Lakes, Imperial Park, Newport: Archaeological Written Scheme of Investigation by GGAT Archaeological Services Report no. 2023/048, dated September 2023).

<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

3 Roles and Responsibilities

3.1 Project Manager

- 3.1.1 The NGED Project Manager (PM), Ray Andrews Tel: 01443 219268, will have ultimate responsibility for ensuring that the CEMP is implemented and adhered to by all those involved in the construction works. The Project Manager will be supported by the following roles.

3.2 Environmental Manager / Team Project Manager

- 3.2.1 Jill Russell is the NGED Environmental Manager (EM) and head of the Environmental Team (ET) who will work with the PM to ensure that the construction works are appropriately managed and accord with the requirements of the CEMP and the environmental policies of NGED. Specifically, the EM / ET will:-
- Organise any environmental training required by site personnel
 - Provide advice and deal with queries and correspondence on environmental issues
 - Host Regular meetings and undertake audits to review the operation and effectiveness of the CEMP. The results shall be reported by the Environmental Manager at monthly construction meetings and used to update the CEMP.

3.3 Ecological Clerk of Work

- 3.3.1 Ray Andrews will assume the Ecological Clerk of Works (ECoW) for the duration of construction until handed over under CDM to the new construction team. The ECoW is responsible for:-
- Ensuring the Contractor is compliant with the CEMP
 - Inspecting the Contractors work site
 - Monitoring or inspection of site activated in response to incidents, breaches of the CEMP or complaints received from third party
 - Inspection of works to ensure that ecological mitigation measures incorporated into the design have been implemented
 - Implementation of corrective mitigation measures were proposed mitigation results in environmental effects over and above licenced or planning conditions
 - Ecological Clerk of Works should also ensure that works is undertaken in accordance with the EPS license for the site due to presence of Dormice.

<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

3.4 **Site Manager**

- 3.4.1 Site Manager – Ray Andrews, This person will familiarise themselves with the CEMP and will ensure that all site personnel are aware of its content. Specifically, the Site Manager will:-
- Deal with site enquiries or requests from regulators and local residents
 - Report major incidents to the project team immediately, and to statutory authorities where required
 - Log and monitor incidents and non-conformances
 - Disseminate information, including changes to legislation, and relay to employees
 - Identify employees who require environmental training and maintain training records in line with contract for the works
 - Carry out site audits as required NGED Project Manager (PM) will have ultimate responsibility for ensuring that the CEMP is implemented and adhered to by all those involved in the construction works.
 - The PM will be supported by the following roles.

3.5 **All Staff**

- 3.5.1 All Staff members have a responsibility for the environment. Responsibilities include but are not limited to:-
- In the case of an incident, stop work, implement control procedures and report it to the Site Manager
 - Contact the Waste Contractor when waste needs collecting
 - Pass any queries or correspondence on environmental issues to the Site Manager
 - Work in accordance with Environmental Procedures, any Environmental Plans and Method Statements.

3.6 **Main Works Contractor**

- 3.6.1 The principle CDM holder, currently Walters Group, will manage the health and safety of employees and others affected by works within the site and the contractor, in accordance with Walters Group requirements.
- 3.6.2 The performance of the principal contractor will be monitored by the Project Manager on a regular basis against health and safety plans in order to highlight any deviations or exceptions, recovery plans and areas of concern.

4 Environmental Training and Awareness

4.1 Inductions

- 4.1.1 The Environmental Manager will set out a series of induction courses for all site personnel. The induction courses shall ensure all site personnel are aware of the environmental risks and hazards which have the potential to arise during construction. The inductions will inform the construction team on how to identify relevant environmental risks on site, record actions taken to protect the environment and implement best practice to minimise pollution.

The contractor will set out a programme of training to enable all site personnel to be aware of the potential risks to the environment throughout construction.

Environmental Awareness Toolbox Talks will be delivered by the Environmental Manager; these will provide an update to the site team on any relevant environmental issues as construction progresses. An associated registry of attendance will be signed and kept as a record and a copy of the Toolbox Talk left at the site office.

Selected Members of the site management team will be given practical training in the use of spill kits, appropriate Personal Protective Equipment (PPE), clean up procedures and the appropriate disposal and recycling plans.

- 4.1.2 Environmental Topics covered in the induction shall include but will not be limited to:-

- Water Resources
- Pollution Prevention
- Emergency Response Procedures
- Waste Management and Housekeeping
- Management Structure
- Duties and Responsibilities
- Relevant Procedures
- Ecologically Sensitive Areas and any Protected Species Restrictions
- Incident Reporting
- Consents and Licences
- Legislation
- Environmental Best Practice

4.2 **Environmental Inspection, Monitoring and Reporting**

Regular monitoring, auditing and reporting of the environmental management of the site will be undertaken for the duration of construction.

4.3 **Pre-Construction**

4.3.1 Prior to construction a pre-construction audit will be undertaken by the Environmental

4.3.2 Manager to ensure that any specific requirement of this Outline CEMP and relevant legislation, licences and consents have been met. This audit will determine the adequacy of the system set up for management, mitigation and monitoring measures related to waste, pollution and the environment

4.3.3 Daily Site Checks of the construction compounds and other working areas will be undertaken as required. Checks will be undertaken by the Environmental Manager, or other suitably qualified staff. Any actions resulting from these checks will be reported at weekly progress meetings.

4.3.4 A Weekly Site Inspection will be carried out by the Environmental Manager to identify any breaches and/or environmental incidents and identify suitable corrective measures. Site inspections to ensure construction practice is compliant with best working practices and approved RAMS will be carried out by the Health & Safety Advisor.

4.3.5 Monthly Site Reports – The Environmental Manager will prepare a monthly environmental report to be tabled at the monthly site progress meetings. This report will monitor the implementation of the CEMP and review the ongoing site monitoring and inspections.

4.4 **Incident Response Planning**

4.4.1 The Contractor will develop a Pollution Incident Response Plan that identifies the procedures for the event of a pollution incident during construction. The procedures will be in accordance with the guidance set out in GPP 21 Pollution Incident response planning.

All environmental incidents and accidents will be recorded and reported to the Contractors Site Foreman and the Project Manager. Following a review of the incident, the Environmental Manager will instigate an appropriate change in procedures where necessary. The appropriate equipment requirement to implement these procedures shall be made available by the Contractor and stored with their compound.

4.5 **Toolbox Talks**

- 4.5.1 Regular “Toolbox talks” on specialised topics shall be used to highlight issues of concern and to disseminate new information not previously provided. They will also offer site personnel with the opportunity to feedback.
- 4.5.2 Toolbox talks shall include, but will not be limited to, instances where:
- There is a change to existing legislation, which requires an operational change
 - Site inspections or audits have identified corrective actions which require rolling out
 - Work is being undertaken in environmentally sensitive areas
 - There are significant changes in environmental conditions, such as heavy rainfall
- 4.5.3 The Toolbox Talks will be provided as often as necessary to address site specific environmental requirements.
- 4.5.4 Toolbox talk topics for environmental management shall include, but will not be limited to:- In the case of an incident, stop work, implement control procedures and report it to the Site Manager
- Ecologically sensitive areas
 - Environmental incident and reporting
 - Invasive Species
 - Protected species
 - Water management
 - Waste management and segregation
- 4.5.5 Records of all Toolbox Talks and attendance will kept in the Site Managers Office.

4.6 **Communications**

- 4.6.1 The relevant Environmental Policies of NGED will be available at the Site Managers Office and any other relevant information.

5 Management of Environmental Impacts

5.1 Ecology

- 5.1.1 NGED shall ensure that mitigation measures are implemented in consultation with the ECoW to ensure that no species are harmed and disturbance to their habitat is prevented or if not possible, minimised. All relevant licences shall be adhered to previously obtained by Burroughs / Walters group.
- 5.1.2 The Environment Manager will oversee all other activities, with support from the ECoW who will oversee the management of any ecological issues for licensable activities.
- This will include Toolbox Talks provided by a Suitably Qualified Ecologist (SQE) to all site personnel to inform them of any relevant ecological features at the site including Invasive Non-native Species (INNS), protected and notable species and details of any statutory or non-statutory designated sites. It will also include details of legislation relating to protected species on site prior to the commencement of construction works. An associated registry of attendance will be signed and kept as a record and a copy of the Toolbox Talk left at the site office. This will be limited to the Substation site, and access route.
- 5.1.3 The construction phase includes minimal preparation works, due to area within substation build being reduced to formation level before handover to NGED.
- 5.1.4 Works are planned to commence in early 2025, with the minimal preparation works starting prior to main contract works commencing.
- 5.1.5 The principle contractor will undertake a pre-construction walk through to identify any issues prior to the commencement of works, 3rd party consultation could be held at this point.
- 5.1.6 **General Considerations** – Staff and contractors on site will be made aware of all protected species issues on site through toolbox talks. Laminated plans will be provided identifying key ecological areas as identified in the ecological assessment and pre-construction walk through. This will be limited to the Substation site, and access route
- 5.1.7 Habitats to be protected by others and fences to be installed before work starts, this will be undertaken by others. As per decision issued on 7th February 2024 – Appendix A.
- 5.1.8 **Access and storage of materials**
Access is restricted directly to the Substation Site only, no further access tracks will be required. All materials to be stored within the Substation Site as per plan

5.2 Designated Sites

Statutory and non-statutory Statutory and non-statutory designated sites are shown within the following figures of the Ecological Impact Assessment (EclA): Figure 3: Statutory Designated Sites within 10km (International), Figure 4: Statutory Designated Sites within 2km (National) and Figure 5: Non-Statutory Designated Sites within 1km. Designated Sites are included in this Outline CEMP in Appendix A.1 Designated Sites.

No operational effects to designated sites are anticipated from the proposed works due to the nature of the works and embedded design measures and therefore only construction effects are considered. Potential effects during construction are limited to deterioration of water quality, within the connecting Severn Estuary Marine Site and River Usk Special Area of Conservation (SAC), which has the potential to indirectly affect qualifying habitats and species. Other effects comprise potential disturbance to mobile qualifying species that may be present within the site such as otter through increased lighting. Additionally, there is the potential for harm for example through sedimentation and smothering of fish, and or entrapment of otter within open excavations. Pre-construction checks relevant to designated sites features are detailed under protected species Section below.

Best practice construction measures, will significantly reduce or remove any impacts on qualifying features of the Severn Estuary Marine Site and River Usk SAC along with the St Brides SSSI, including:

5.3 Best Practice Pollution Control

No field ditches or reens will be directly affected by the Proposed Development. All development and/or construction activities are over 7m from field ditches and 12.5m from reens. There is a risk that construction activities may inadvertently lead to dust, pollution events, or sediment run-off resulting in damage to those habitats (including designated sites and watercourses) that are within relatively close proximity and/or are hydrologically connected to the site, including those of the SSSI.

Site-specific methods to ensure that all site activities in proximity to watercourses and waterbodies will be undertaken in accordance with relevant legislation and undertaken in compliance with the relevant Guidance for Pollution Prevention (GPP) (e.g. GPP 5: Works and maintenance in or near water¹) and industry best practice (including that from the Construction Industry Research and Information Association (CIRIA), CIRIA C811 (previously C741) Environmental good practice on site guide, and during construction ecological supervision of the dewatering of the attenuation basin will occur. In advance of works commencing, silt fencing, silt busters or bales will be necessary to prevent silt or contaminants from being released into connecting watercourses.

¹ <https://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf> [assessed 05.04.2024]

5.4 **Lighting Management**

Where required, construction lighting will be minimised and avoid illumination of adjacent habitats. Where there is light spill onto the peripheral habitats of the development area, these will not be greater than 0.5 Lux.

5.5 **Covering Open Excavations at Night-Time or Providing Ramps**

Any open excavations during construction will be covered at night or a means for escape, such as ramps, provided to reduce the risk of trapping or injuring otters (and badger) and a buffer zone will be maintained around field ditches at night to avoid unnecessary adverse impacts to otter.

5.6 **Sites of Importance for Nature Conservation (SINC) grassland**

Topsoil and subsoil will be stripped, handled and stored with care for future use in the landscape and habitat creation scheme.

5.7 **Dewatering**

Dewatering activities and all pond works are being done by others under a separate CEMP and MS

5.8 **Vegetation Clearance**

This will be undertaken by Walters-Group prior to NGED's work commencing.

5.9 **Breeding Birds**

Pre-construction breeding bird checks must be carried out up to 24h prior to the commencement of works within 20m of suitable breeding bird habitat during breeding bird season (March – September) by a SQE.

5.10 Bats

All bats are EPS and are protected under the Conservation of Habitats and Species Regulations 2017. All current legislations will be adhered to whilst undertaking construction works. Targeted bat surveys have been undertaken. No suitable potential bat roosts have been identified within the vicinity of the works.

Lighting during construction will aim to avoid and minimise illumination in areas that contain ecologically sensitive habitats (ditches, waterbodies, treelines). Temporary construction lighting required within bat activity periods will be directional lighting (towards ground) and designed to ensure there is no light spill onto any identified roost or potential commuting and foraging areas which are being retained. Where there is light spill onto the peripheral habitats of the buffer area, these will not be greater than 0.5 Lux. Works with a high level of noise and vibration will be timed sensitively; to be undertaken in daylight hours only, commencing after dawn and stopping before dusk to mitigate impacts to foraging and commuting bats.

The proposed development will have limited short-term impacts on foraging and commuting habitat with no long-term impacts anticipated. The surrounding habitats have plenty of opportunities for feeding bats, so the limited, temporary disturbance will not adversely affect foraging bats.

5.11 Reptiles

All reptiles are protected under the Wildlife and Countryside Act (1981, as amended) and against intentional or reckless killing, injury and sale (or advertising for sale).

Grassland that will be cleared and grassland in working areas is to be kept short to maintain the area as unsuitable habitat for reptiles.

The vegetation clearance will be undertaken separate to the CEMP, however, any further clearance or maintenance that may be required must adhere to the Vegetation Clearance Method Statement.

Mitigation and compensation for the loss of reptile habitat is delivered separately under the Vegetation Clearance Method Statement, within the fenced off areas. No entry of construction works to fenced off habitat areas will be permitted. Ground clearance works (including removal of tree roots) is to avoid the reptile hibernation period (November-February).

This will be undertaken by Walters-Group prior to NGED's work commencing.

5.12 Dormice

All site clearance has been undertaken by Walters-Group prior to NGED's work commencing. As principle contractor, Walters-Group to advise prior to NGED entering site.

No machinery or plant are to enter dormouse mitigation areas, NGED to be advised accordingly by the Principle Contractor.

No further vegetation clearance is anticipated by NGED as already undertaken by Walters-Group. However should any additional clearance be deemed necessary, a SQE must be consulted as additional EPS licences may be required for these works. All steps that involve the assessment of suitability of habitat for protected species will be undertaken by the ECoW.

5.13 Badgers

Pre-construction badger surveys were carried out on 30th January and 1st February 2024, before the vegetation clearance works were undertaken by Walters-Group, to confirm the presence/likely absence of badger activity/badger setts within 50m of the site. No badger setts were recorded, as such, sets are considered absent, however, potential signs including badger hair and snuffle holes were recorded within 50m to the east of the works. As such, the site may still be used for foraging badger and precautionary measures are to be put in place (lighting, noise and open excavations). Pre-commencement checks for badger should take place prior to starting any construction works. Any open excavations during construction will be covered at night or a means for escape, such as ramps, provided to reduce the risk of trapping or injuring badgers.

5.14 Otter

Riparian mammal surveys were carried out 30th January and 1st February 2024, before the vegetation clearance works. Three potential otter slides were recorded on the banks of watercourses within the 200m buffer location, no other field signs of otter or otter holts were found. Pre-commencement checks for otter should take place prior to starting any construction works.

Night-time works could disturb resting, foraging or commuting otters within approximately 100m of the Proposed Development. Best practice measures should be put in place during construction including directional lighting away from waterbodies/watercourses and noise management. Temporary construction lighting required will be directional lighting (towards ground) and designed to ensure there is no light spill onto any commuting and foraging areas which are being retained. Where there is light spill onto the peripheral habitats of the buffer area, these will not be greater than 0.5 Lux.

Any open excavations during construction will be covered at night or a means for escape such as ramps provided to reduce the risk of trapping or injuring otters and a buffer zone (construction free, although grassland and tree planting will be permitted) of at least 50m will be maintained to the watercourse on the southern boundary of the site to avoid unnecessary adverse impacts to otter. See Figure 6 within the EcIA for watercourse locations to the south of the site.

5.15 **Water Vole**

Surveys for water vole were carried out on 30th January and 1st February 2024, before the vegetation clearance works, to confirm the presence/likely absence of water vole on or adjacent to the site. No water vole signs or activity have been recorded within 200m of the site. Pre-commencement checks for water vole should take place prior to starting any construction works.

Night-time works could disturb water vole within approximately 50m of the Proposed Development. Best practice measures should be put in place during construction including directional lighting away from waterbodies/watercourses and noise management. Temporary construction lighting required will be directional lighting (towards ground) and designed to ensure there is no light spill onto any foraging areas which are being retained. Where there is light spill onto the peripheral habitats of the buffer area, these will not be greater than 0.5 Lux.

Any open excavations during construction will be covered at night or a means for escape such as ramps provided to reduce the risk of trapping or injuring water vole and a buffer zone (construction free, although grassland and tree planting will be permitted) of at least 50m will be maintained to the watercourse on the southern boundary of the site to avoid unnecessary adverse impacts to water vole. See Figure 6 within the EcIA for watercourse locations to the south of the site.

5.16 **Ecological Enhancement Measures**

Walters-Group as principle contractor to advise NGED's prior to work commencing of the HMMP which will have been approved as per Condition 6.

6 Waste Management Ecology

- 6.1 Storage of construction waste is to be placed within a designated area within the proposed substation and segregated as per environmental plan / waste management plan, any residual waste that cannot be utilised on site shall be sent off site for re-use-recycling or disposed of at a suitably permitted facility.

Disposal of any surplus rock or subsoil (not currently anticipated) shall be agreed with appropriate parties and used for bunds at site.

The site compounds will require daily inspection and maintenance including appropriate storage of materials, litter picks and general housekeeping to ensure health and safety risks as well as environmental considerations are appropriately managed

7.0 Protection of Ground and Surface Waters

- 7.1 Whilst carrying out excavations all excavated soil shall be deposited away from any Watercourse. Any excavated material that is being repurposed for backfill will need to be stored on geotextile material and covered when not being used with 1000 gauge polythene to minimise water logging/run-off in wet weather conditions.
Any exported materials will be W.A.C. (Waste Analysis Certificated) tested to ensure its compliance with waste regulations and materials are being sent for disposal to the correct waste facility.

Roads and hard surfaces will be kept clean to prevent a build-up of mud and sediment that could contaminate surface water. Road Sweeper to be employed on regular basis to ensure roads are kept clean. Road cleaning to be monitored for frequency due to working operations. Wheel wash facilities will be provided at the exits from the construction compound and work site where appropriate.

NGED shall identify all watercourses, drains and potential conduits and where necessary, measures shall be taken to minimise direct sediment and silt-laden run-off from the working site into watercourses.

Geotextile membrane shall be used to prevent direct sediment and silt laden run off from entering watercourses. Any other areas identified whilst undertaking the works which are not specifically identified on the above mentioned plans will also use the same measures.

Working areas will not be within 7 metres of watercourses to protect the bank from disturbance and pollution. Where this is not possible guidance from GPP 5: Works and maintenance in or near water will be followed.

7.2 Surface Water and Ground Water Management

7.2.1 Surface water and groundwater monitoring plans will be implemented during construction. The Contractor will consult with Natural Resources Wales regarding water quality, flow and level monitoring to be undertaken for watercourses and groundwater that will be affected by construction works or discharge of surface water run-off, which will include the following, as appropriate:

- Pre-construction monitoring to establish baseline water quality conditions for watercourses and groundwater;
- Monitoring during construction works to enable the effectiveness of mitigation measures to limit pollution risk to be monitored and any pollution incidents to be identified; and
- Monitoring of watercourses or groundwater receiving surface water runoff during construction to enable the effectiveness of treatment and other sustainable drainage systems measures to be determined and to ensure that an unacceptable rise in groundwater levels does not occur.

The Contractor will carry out appropriate monitoring to identify:

- Pollution risks that are unacceptably high;
- Spillages and leakages;
- Non-compliance with the CEMP; and
- Suspected pollution incidences.

7.2.2 Appropriate actions will be taken where pollution risk is unacceptably high, where there is non-compliance with the CEMP, where spillages and leakages are unacceptable or where there are any suspected pollution incidents.

7.2.3 Ground water monitoring will be undertaken at any ground water sensitive areas, as required, to inform the design of the Project and development of construction.

7.2.4 A surface water management system will be set up early in the construction period to capture all runoff and prevent ingress of sediments and contaminants into existing drainage ditches where necessary. This would be managed in accordance with CIRIA Guidelines.

8.0 Excavations and Dewatering

All water from dewatering will be treated prior to discharge. As a minimum, water will be passed through a silt buster, settling pool, or bales to prevent silt or contaminants from being discharged into the reens network at the location of the existing outfall.

Further information on dewatering of the ponds is detailed in Table 3 ECO26.

9.0 Flood Risk

Construction activities will be undertaken having regard to the requirements to avoid any significant increase of flood risk. Appropriate measures will be implemented by the Contractor to prevent, so far as is reasonably practicable, damage to equipment or the works during potential flooding events. Suitable access and safe refuges are to be identified for use in the event of a flood.

10.0 Foul Water Drainage

The Proposed Development will dispose of the foul water using an on-site cesspit. The Contractor will manage and dispose of foul water and sewage effluents from site facilities, complying with GPP 4: Treatment and disposal of wastewater where there is no connection to the public foul sewer.²

11.0 Pollution Prevention and Emergency Response

11.1 Pollution Prevention measures

Strict pollution prevention measures and biosecurity measures are to be detailed within the Contractor's RAMS.

11.2 Reens and Ditches

No field ditches or reens will be directly affected by the Proposed Development. All development and/or construction activities are over 7m from field ditches and 12.5m from reens. There is a risk that construction activities may inadvertently lead to dust, pollution events, or sediment run-off resulting in damage to those habitats (including designated sites and watercourses) that are within relatively close proximity and/or are hydrologically connected to the site, including those of the SSSI.

² <https://www.netregs.org.uk/media/1887/guidance-for-pollution-prevention-4-2022-update.pdf> [Accessed 05.04.2024]

11.3 Site specific methods

Site-specific methods to ensure that all site activities in proximity to watercourses and waterbodies will be undertaken in accordance with relevant legislation and undertaken in compliance with the relevant Guidance for Pollution Prevention (GPP) (e.g. GPP 5: Works and maintenance in or near water³) and industry best practice (including that from the Construction Industry Research and Information Association (CIRIA), CIRIA C811 (previously C741) Environmental good practice on site guide, and during construction ecological supervision of the dewatering of the attenuation basin will occur. In advance of works commencing, silt fencing, silt busters or bales will be necessary to prevent silt or contaminants from being released into connecting watercourses.

11.3.1 Strict pollution prevention measures will be implemented during the construction phase to help manage potential impacts to surface and groundwater. The following measures will be put in place to prevent pollution to the water environment:

- Any hazardous materials (such as fuels, oils and chemicals) will be stored in a secure area with suitable secondary containment (e.g. drip trays, bunds);
- Refuelling of plant and machinery onsite would be carried out in a designated area with suitable measures for the containment of any spillage; all refuelling, oiling and greasing will take place above drip trays or on an impermeable surface which provides protection to underground strata and watercourses and away from drains as far as reasonably practicable;
- All construction staff will receive appropriate training of what to do in the event of a spillage and there will be provision of spill kits on site. Machinery will be regularly maintained and checked to minimise the risk of spillage;
- Restrictions will be placed on the use of machinery near adjacent water bodies;
- Concrete pouring must only take place in dry conditions and suitable measures must be in place to contain, treat or remove any contaminated waters;
- Suitable measures (e.g. sediment entrapment mats, silt fencing) must be installed when working in or along watercourses to contain any disturbed sediment;
- Any runoff from construction areas with elevated suspended solids must be treated prior to discharge. Approval must be obtained from Natural Resources Wales for any discharges to controlled waters. Treatment measures could include perimeter cut-off ditches, settlement lagoons, overland flow and/or settlement tanks;
- Wheel wash facilities will be provided for vehicles moving to and from the construction site at all entry and exit points. Silty water from wheel-washes will require appropriate disposal to prevent unacceptable levels of suspended solids entering any nearby surface water bodies. As noted above, any disposal of surface water generated on site during construction to controlled waters will require consent from Natural Resources Wales. Wheel washing facilities will be located as far from surface waters as possible;

³ <https://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf> [assessed 05.04.2024]

- If dewatering is required, pumped groundwater will be disposed of appropriately and any relevant consents obtained;
- The reseeded of cleared land will be undertaken as soon as practicable, to minimise exposed land and the entrainment of sediment by overland flow.
- If dewatering is required, pumped groundwater will be disposed of appropriately and any relevant consents obtained;
- The reseeded of cleared land will be undertaken as soon as practicable, to minimise exposed land and the entrainment of sediment by overland flow.

- 11.3.2 The Contractor will develop a Pollution Incident Response Plan that outlines key pollution mitigation measures to be adopted including a Control of Substances Hazardous to Health (COSHH)/ fuel inventory and key contacts to be notified in the event of a significant pollution incident, which may subsequently lead to the contamination of controlled waters or soils.
- 11.3.3 All construction plant shall be in good working order, have safe to use certificate and checked for leaks of fuel and lubricants before being allowed into the working area.
- 11.3.4 A suitable quantity of pollution control equipment e.g. spill kits containing absorbent pads, absorbent granules etc. will be kept with the work crews and principal contractor at all times of workings
- 11.3.5 Any spilt oil or fuels will be absorbed using a spill kit and disposed of as Hazardous Waste and responsible cleaning of materials shall be undertaken by suitably qualified personnel.
- 11.3.6 Fuel and oil storage tanks will be bunded and locked when not in use. All refuelling will be limited to designated fuelling area where suitable spill kits and drip trays will be utilised and ready to use.
- 11.3.7 Materials stored in drums will be in or on a bunded area that has a minimum capacity of 25% of the total volume to be stored.
- 11.3.8 All fuel / oils / chemicals will be stored in original containers with clear manufacturers instructions and labels on them.
- 11.3.9 Spill kits to be readily available on the construction site for any spillages that may occur.
- 11.3.10 All construction plant will be regularly checked and maintained to ensure any leaks are repaired and kept to a minimum when working on the site.
- 11.3.11 Small plant such as welding unit will be kept on spill trays or similar to prevent unnecessary spillages.

11.4 **Flood Warning**

- 11.4.1 The requirements of NRW, with regards to flood defence, shall be adhered to and any necessary mitigation measures implemented and relayed to the workforce.
- 11.4.2 If a flood warning is issued, NRW will be consulted on the NRW floodline – 0845 9881188, and the flood risk assessed. If the flood risk is high, the following measures can be taken to eliminate environmental impact as a result of flooding:-
- Plant, fuel and chemicals shall be removed from the flood zone immediately
 - Evacuation of personnel from the working areas at risk of flooding – this is the primary safety consideration, and is the highest priority.
 - Topsoil and subsoil heaps shall be further treated/protected if deemed necessary

11.5 Air Emissions

- 11.5.1 Vehicles and Plant – Most plant and machinery used in the working area would be powered by diesel engines. In order to control excessive exhaust emissions and smoke, NGED and the contractors shall ensure that all plant is correctly adjusted and checked as being in good working order before being allowed on site and is adequately maintained.
- 11.5.2 Dust – Damping down shall control dust during prolonged periods of dry weather. Contractors shall ensure that public highways are kept clear of mud and other debris that may have been tracked from the site. This will be achieved using road sweepers or through manual brushing depending on severity. The monitoring of dust and/or visual inspections shall form part of the daily site inspections where roads are nearby.

11.6 Light

- 11.6.1 In any instances where lighting is required, directed working area lights shall be positioned or shielded so as to avoid nuisance to both properties and highways.
- 11.6.2 Security lighting should be limited to construction working areas and lay down areas where plant and materials are left overnight. This will be minimised.
- 11.6.3 Construction task lighting will be limited to the winter months when it is dark for a limited period at the beginning or end of the working day. This would be intermittent and dynamic and change location and intensity as the construction activities demand.
- 11.6.4 Where it is necessary to use security and construction task lighting, this would be low level and fully cut-off or “fully shielded” in order to minimise adverse light pollution effects on the night-time environment. And shall be positioned so that it does not shine on riparian, woodland or other sensitive habitats.
- 11.6.5 Lighting during construction will aim to avoid and minimise illumination in areas that contain ecologically sensitive habitat. Where there is light spill onto the peripheral habitats of the buffer area, these will not be greater than 0.5 Lux.

11.7 Noise and Vibration

- 11.7.1 Contractors shall control noise on the working areas in accordance with BS 5228, Noise Control on Construction and Open Sites. Site inspections shall include checks to ensure that plant is operated with any specified acoustic covers in place. Excessively noisy plant shall be removed from site for repair or maintenance. Quieter construction methods will be used, where required and where considered reasonable and feasible.

- 11.7.2 Equipment will be switched off when not in use.
- 11.7.3 Where possible loading and unloading are to be undertaken away from residences.
- 11.7.4 Where possible noisy plant should not be used simultaneously and/or in close proximity to avoid cumulative noise impacts.
- 11.7.5 Normal working hours, inclusive of deliveries, are expected to be:-

Mon –Sat 07.30 to 17.30*

*Work hours may continue until 19.00 during periods of critical works.

The contractor / NGED shall aim to be a proactive and considerate neighbour; any potentially affected residents shall be approached in advance of any potential disturbance and kept informed of works progress. Where work is required outside of standard hours any such works will be limited and will be kept to a practical minimum. Also, the contractor / NGED should provide information such as total construction time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur, to affected residents, reasonably ahead of time.

11.7.6 **Vibration**

To minimise adverse vibration as far as is reasonably practicable, the following mitigation measures will be considered:

Low vibration working methods; plant will be carefully selected to minimise the potential for vibration.

Vibration controlled at source and spread of vibration limited.

Plant and/or methods of working likely to cause significant levels of vibration at sensitive receptors would be replaced by other less intrusive plant/methods of working.

Where processes could give rise to significant levels of vibration, on-site vibration levels would be monitored regularly.

- 11.7.7 To minimise adverse vibration as far as is reasonably practicable, the following mitigation measures will be considered:-

- Low vibration working methods; plant will be carefully selected to minimise the potential for vibrations
- Vibration controlled at source and spread of vibration limitedPlant and/or methods of working likely to cause significant levels of vibration at sensitive receptors would be replaced by other less intrusive plant/methods of working.
- Where processes could give rise to significant levels of vibration, on-site vibration levels would be monitored regularly.

11.8 **Traffic Management**

- 11.8.1 Access to site shall be from existing and agreed points only.
- 11.8.2 All materials will be delivered to the nearest point from the works areas.
- 11.8.3 Any public rights of way encountered during works shall be identified on NGED plans and kept open at all times. If necessary temporary fencing will be used to secure work areas from members of the public.
- 11.8.4 Parking of vehicles will mainly be with consent on the substation ground or away from the roadside on land where the works are taking place. Exact locations will be pre agreed with all parties prior to the works commencing. Parking of vehicles will only be with the consent of the principle contractor. Please reference Appendix B Discharge Planning Condition 7 – 5th August 2024.

11.9 **COSHH**

- 11.9.1 All site personnel will be made aware of the COSHH requirements through specific toolbox talks and daily site inspections will review and monitor the storage and issue of materials.

11.10 **Storage and handling of fuel and lubricants**

- 11.10.1 Refuelling on the site shall be undertaken at least 20 metres from any watercourses; mobile plant shall be pulled back from watercourses for refuelling as far as possible. Refuelling shall be carried out in designated areas only with dual bunded pumps and absorbent mats

11.11 **Herbicides**

- 11.11.1 Should herbicide use be necessary (e.g. to deal with invasive species or other undesirable species), this would be limited to spot treatment. Herbicides should be used as a last resort where other methods such as hand removal have failed or are not appropriate, due to their environmental impacts and human health impacts. Not that certain invasive non-native species may require herbicide application to eradicate and that an invasive species specialist will be required to advise on how to safely and effectively remove invasive species before any action is taken.
- 11.11.2 Only trained sub-contractors shall apply herbicides if required. Certificates of competence shall be inspected before application is allowed and a record of application made in accordance with the Control of Pesticides Regulations 1986. If herbicide is required within 10m of a watercourse, it shall be suitable for use in or near water courses and be approved by NRW.
- 11.11.3 Herbicides shall not be stored on site and will be stored according to best practice off site.

11.12 Invasive Species and Biosecurity

- 11.12.1 Non-native invasive species (plant or animal) are those that were introduced into the UK by accident or as a result of trade or collection. As a result, they have limited pests and diseases and are detrimental to native species.
- 11.12.2 The Contractor will ensure that bio-security measures, including those in relation to invasive species, will be implemented. This includes briefing staff in the form of Toolbox Talks.
- 11.12.3 Site operatives shall be made aware of the locations and full extents of invasive weeds on and in the vicinity of the site and the control measures implemented.
- 11.12.4 Suitable signage shall be attached to fencing to raise awareness and restrict access.
- 11.12.5 Standard good practice measures will be implemented including making all site members aware of the presence of INNS through Toolbox Talks delivered by the ECoW.
- 11.12.6 If site members suspect INNS are present in other areas, they should immediately inform the site manager and a SQE should be contacted for advice.
- 11.12.7 Any invasive species shall be avoided. Although no INNs have been recorded within the site boundary, if the presence of invasive species is suspected or identified, the site manager must be notified.
- 11.12.8 All machinery and boots should be cleaned before entering and prior to leaving site, to avoid cross contamination of any soil-borne diseases or INNS material.
- 11.12.9 No works or access tracks is to occur within 7m of the INNS Plants.
- 11.12.10 Vehicles will use pre-agreed designated tracks for access to prevent the spread of INNS.
- 11.12.11 All operatives should receive training and have detailed procedures to follow with respect to the cleaning machinery and PPE.
- 11.12.12 Appropriate Biosecurity will be detailed within the Contractors RAMS.

11.13 Contaminated Land

- 11.13.1 A baseline study has been undertaken which has considered the potential for contamination to be present in soils and groundwater beneath the Proposed Development as per records previously submitted to NGED. No significant sources of contamination were identified and therefore it is unlikely that contaminants will be encountered.

- 11.13.2 Should any unforeseen contamination be encountered during construction of the Proposed Development, work will be stopped; NRW contacted via the NRW incident hotline on 0300 065 3000 (and/or the NRW Flood line on 0345 988 1188) and the local planning authority informed as soon as is practicable. A risk assessment will be undertaken to identify additional actions which may be required. Any proposed remedial strategy will be submitted for approval by the local planning authority, if required.
- 11.13.3 NGED has designed its proposals to avoid all Third Party services wherever possible. Where third party services cannot be avoided, NGED will work closely with the organisation responsible for their operation or maintenance to minimise effects on operations.
- 11.13.4 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 prior to starting works. All plans to be submitted to NGED by 3rd parties before work commences
- 11.14 **Archaeology**
- 11.14.1 An archaeological WSI has been produced for the Proposed Development by The Glamorgan-Gwent Archaeological Trust Ltd (GGAT). The archaeological works will be undertaken in line with the requirements in the Chartered Institute for Archaeologists' Standards and guidance for an archaeological watching brief (2014, revised 2020).

The WSI details the generic principles, standards, methods and techniques to be employed for cultural heritage works. This includes, but is not limited to:

- Archaeological deposits will be recorded with a single continuous context numbering system.
- Where appropriate, archaeological features will be drawn at a suitable scale.
- All significant contexts will be digitally photographed, with a resolution of no less than 10 megapixels.
- All classes of finds will be cleaned and catalogued; they will be retained until arrangements for final deposition have been agreed.

Should human remains be encountered, the coroner will be immediately informed. The nature and extent of those remains will be established and recorded, but the remains will be left in situ, with suitable measures in place to ensure their protection during backfilling.

Reporting and archive will take place and Finds deposition will take place.

The following assets may be impacted by construction works. To mitigate this a watching brief will be employed by NGED's principal contractor during construction works.

The Great Pencarnou asset

An unknown hard surface asset

Previously unknown archaeological assets including roman roads and features associated with the surrounding Gwent Levels landscape

11.14.2 Should any unforeseen archaeological remains be encountered during the development, works will temporarily cease and archaeologist will be consulted to take appropriate action by principle contractor. Please reference Appendix C – Archaeological Written Scheme of Investigation. GGAT September 2023.

11.15 **Landscape and Visual Amenity**

- 11.15.1 The contractor will ensure that landscape works are carried out in accordance with the approved landscape scheme. Construction will be carried out using industry best practice, this would include:-
- Lighting associated with the construction phase would be designed to minimise light pollution at night, whilst being consistent with the requirements of site safety and security. Luminaires should be chosen which are directional and minimise up lighting and skyglow.
 - Existing trees to be retained to be protected during construction with protective fencing where necessary, in accordance with BS5837:2012; Site should be kept tidy with materials delivered on an 'as needed' basis where possible.
 - Works should be undertaken in daylight hours wherever possible.
 - The lighting levels for the construction compounds should be kept directional and as low as possible to reduce night-time effects.
 - Land required for construction compounds would be returned to its original use and condition as per before the works.

11.16 **Management of Soils on Site**

- 11.16.1 Careful and resourceful stripping, handling and storage of site-won topsoil and subsoil will be carried out on site in accordance with the Materials Management Plan and the Mitigation measures GC02 and GC03 above. This is to ensure retention of valuable won soils and seedbanks and cost effective and environmentally conscious reuse of material in the proposed landscape scheme.

11.17 **Reinstatement Planting (trees, shrubs, hedgerow and grassland creation)**

- 11.17.1 Reinstatement planting and habitat creation across the site will take place post construction to replace the existing vegetation lost as a result of the works and are to be done by other, this will be covered within a separate CEMP and Landscape and Ecological Management Plant (LEMP) and in accordance with the landscape specifications. The fencing of habitat to be retained or used for planting must not be moved. The retained habitat parcels are not be to be assessed or used for storage before, during or after planting.

11.18 **Emergency Contact Details**

- Site Manager – Ray Andrews – 01443 219268 / 07554 158138
- Works Manager – Lisa Porter – 01443 219132
- HSE Manager – Craig Wakefield Coates – 01443 211957
- Group HSE Manager – Aymlee Tiley - 01443 211957
- GPT – Environmental Management – 01656 741799
- Natural Resource Wales – 0300 065 3000

12 **Monitoring**

As outlined in this document, 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 pre-application.

12.1 **Pre-Construction**

Please reference to the Construction Phasing and Logistics methods Statement 03rd June 2024, Notice of Decision Appendix A , Discharge Planning condition 7 Appendix B, Archaeological Written Scheme of Investigation. GGAT September 2023 Appendix C, Please Reference to the Construction Phasing and Logistics methods Statement Appendix D. These will all be adhered to during the construction phase.

12.2 **During Construction**

Daily visual inspection will be carried out by the onsite Manager and any complaints received from 3rd parties will be monitored / recorded and responded to.

12.3 **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.



Notice of Decision

N Roberts
Arup
4 Pierhead Street
Cardiff
CF10 4QP

TOWN AND COUNTRY PLANNING ACT 1990 [as amended]

Application No: **23/0878**

Application Type: **Full (Major)**

Proposal: **PROPOSED ELECTRICITY SUBSTATION COMPOUND (132/33/11KV), INCLUDING A SWITCH-ROOM BUILDING AND OUTDOOR ELECTRICAL EQUIPMENT, ENCLOSED BY A SECURITY FENCE, WITH ASSOCIATED INFRASTRUCTURE INCLUDING ACCESS, LANDSCAPING, DRAINAGE AND EARTHWORKS**

Site/Location: **Land To The South And East Of, Celtic Way, Celtic Lakes, Newport, South Wales**

Decision Date: **7th February 2024**

In pursuance of its powers under the above Act the Council of the City of Newport notifies you of its decision in respect of your application, registered by them on 3rd October 2023. The application has been:-

Granted with Conditions

STANDARD CONDITIONS

The development must begin not later than the expiration of **FIVE YEARS** from the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

Prior to the commencement of the development hereby approved a notice shall be given to the local planning authority.

- (a) stating the date on which the development is to begin;
- (b) giving details of the planning permission and of such other matters as is required by Schedule 5A to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended (the Order).

REASON: To comply with the requirements of Section 71ZB of the Town and Country Planning Act 1990 as amended by Section 34 of the Planning (Wales) Act 2015.

ADDITIONAL CONDITIONS

1. The development shall be implemented in accordance with the following plans and documents:
 - Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy (Ref: 293651-ARP-XX-XX-RP-YE-002 Rev 3)
 - Plant Schedule (Drawing ref: 293651-ARP-XX-SP-LD-0001 Rev P002)
 - Figure 3. Grassland Compensation Area Vegetation Clearance (Drawing ref: 293651-LD-XX-DR-0403 Rev 4)
 - Figure 4. Proposed Landscape and Habitat General Arrangement (Drawing ref: 293651-LD-XX-DR-001 Rev 5)
 - Figure 5. Existing Conditions and Vegetation Lost and Retained (Drawing ref: 293651-LD-XX-DR-0002 Rev 2)
 - Ecological Impact Assessment (EclA) (Ref: 293651-ARP-XX-XX-RP-YE-0001 Issue 02 - 12 December 2023)
 - Dormouse Conservation Strategy (Ref: 293651-ARP-XX-XX-RP-YE-0004 Rev 2 - 12 December 2023)
 - Planning, Design and Access Statement (Ref: 293651-ARP-ZZ-XX-RP-YP-000001 Rev 3 - 13 December 2023)
 - Two-staged Vegetation Clearance Method Statement (Ref: 293651-ARP-XX-XX-RP-YE-0005 Issue 02 - 12 December 2023)
 - Vegetation Surveys, dated October 2021 by Sturgess Ecology, Document ref: C271/D1/V2)
 - Site Location Plan (Drawing ref: CG1000 P03)
 - Application Plan (Drawing ref: CG10001 Rev P03)

- Existing Site Topography and TAN15 Flood Zones (Drawing ref: CG1002 Rev P03)
- Existing Utilities (Drawing ref: CG1003 Rev P03)
- Proposed General Arrangement (Drawing ref: CG1010 Rev P03)
- Proposed Finished Levels (Drawing ref: CG1011 Rev P03)
- Proposed Site Layout (Drawing ref: CG1012 Rev P03)
- Proposed Connections Plan (Drawing ref: CG1030 Rev P03)
- Proposed Drainage Layout (Drawing ref: CG1040 Rev P03)
- Substation Drainage Strategy Report (Ref: CL-ARP-DGS-00-RP-CD-00001 Rev P04 - 27 September 2023)
- Preliminary Ecological Assessment (Ref: ECO/1 Issue 23 August 2021)
- Landscape Plan Appendix A 293651-ARP-XXX-XX-RP-YE-0005
- Celtic Lakes Substations Flood Consequences Assessment - Version 3, July 2023 by JBA Consulting (Received: 02/10/2023)
- Archaeological Watching Brief, July 2023 by GGAT (Ref: 2023/029)
- Archaeological Assessment, July 2023 by GGAT (Ref: 2023/036)
- Archaeological Written Scheme of Investigation, September 2023 (Ref: 2023/048)
- Noise and Vibration Assessment (Ref: 293651-00-HM Rev P01 - 31 July 2023)
- Celtic Lakes National Vegetation Classification Survey Report, September 2023 - Version V1.0.
- Swept Path Analysis (Drawing ref: CG1020 Rev P03)
- Tree Retention and Removal Plan (Drawing ref: Figure 3)
- Tree Retention and Removal Plan (Drawing ref: Figure 2)
- NGED 132kV/33kV/11kV Substation Proposed Plan (Drawing ref: 15602-HYD-XX-XX-DR-Y-3003 Rev P03)
- NGED 132kV/33kV/11kV Substation Proposed Elevations and Sections (Drawing ref: 15602-HYD-XX-XX-DR-Y-3004 Rev P03)
- NGED 132kV/33kV/11kV Substation Site Plan (Drawing ref: 15602-HYD-XX-XX-DR-Y-3006 Rev P02)
- Celtic Lakes Power - Arboricultural Impact Assessment, Welsh Government, Version V0.1 (July 2023) (Received: 02/10/2023)
- Tree Retention and Removal Plan (Drawing ref: Figure 1)
- Celtic Lakes Geotechnical and Geoenvironmental Interpretative Report (Ref: 4-50, Issue 01 - September 2023)
- Celtic Lakes NGED Substation Landscape and Visual Appraisal Parts 1 - 5 (Ref: 17 July 2023)
- Celtic Lakes NGED Substation Information to Inform a Habitats Regulations Assessment (Ref: 293651-ARP-XX-XX-RP-YE-0003 Issue - 26 September 2023)
- Figure 4: Landscape General Arrangement (Drawing ref: 293651-ld-xx-dr-0001 Rev P03)
- PAC Report (Received: 02/10/2023)
- Celtic Lakes Planning Support - Transport Statement (Ref: 293651-ARP-XX-0001 - 22 September 2023)

Reason: In the interests of clarity and to ensure the development complies with the submitted plans and documents on which this decision was based

- No development shall take place until the applicant, or their agents or successors in title, has secured implementation of a programme of archaeological work in accordance with that out-lined in 'Celtic Lakes, Imperial Park, Newport: Archaeological Written Scheme of Investigation by GGAT Archaeological Services Report no. 2023/048, dated September 2023).
REASON: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource in accordance with Policy CE of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).
- Noise emitted from plant and equipment located at the site shall be controlled such that the rating level, calculated in accordance with BS4142 2014, does not exceed a level of 5dB below the existing background level, with no tonal element to the plant.
Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected in accordance with Policy GP2 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).
- No works (other than vegetation clearance) shall take place on the site at all until a method statement comprehensively detailing the phasing and logistics of construction has been submitted to and approved in writing by the Council as Local Planning Authority.

The method statement shall include, but not be limited to:

- Entrance/exit from the site for visitors/contractors/deliveries
- Temporary works to facilitate access from highway
- Location of directional signage within the site
- Parking for contractors, site operatives and visitors
- Temporary roads/areas of hard standing
- Details of street sweeping/street cleansing/wheelwash facilities
- Hours of working
- Phasing of works including start/finish dates

For the avoidance of doubt all construction vehicles shall load/unload within the confines of the site and not on the highway.

The development shall be carried out in accordance with the approved plan, unless otherwise agreed in writing with the Council as Local Planning Authority.

Reason: To ensure that adequate on-site provision is made for construction traffic, including allowance for the safe circulation, manoeuvring, loading and unloading of vehicles, as well as parking, and to reduce impact on residential amenity and the general amenity of surrounding occupiers in accordance with Policies GP2 and GP4 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

- If, during the course of construction (including, site clearance, demolition and ground works) contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out in accordance with the agreed details.

REASON: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks in accordance with Policy GP7 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

6. No development shall commence until a plan for the provision, management and maintenance of the dormouse habitat features has been submitted to and approved by the Local Planning Authority. The habitat management plan shall build upon the principles and commitments for protected species mitigation and compensation contained within the documents 'Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy Reference: 293651-ARP-XX-XX-RP-YE-0002 Rev 3 dated 12 December 2023' and 'Dormouse Conservation Strategy Reference: 293651-ARP-XX-XX-RP-YE-0004 Rev 2 dated 12 December 2023', and shall include:

- Details of habitats and ecological features present or to be created on and off site, including planting schedules
- Details of the desired conditions of habitats (present and to be created) on and off site
- Details of short- and long-term management, monitoring and maintenance of new and existing habitats at the site, to deliver and maintain the desired condition
- Details of scheduling and timing of activities
- Measures to restrict human access to habitat creation areas
- Details of monitoring of ecological features
- Details of replacement measures should any landscape or environmental features die, be removed or become seriously damaged or diseased within years of completion of development
- Details of management and maintenance responsibilities
- Details of measures to eradicate invasive non-native species, including *Cotoneaster* spp
- Details of timescales, length of plan, the method to review and update plans (informed by monitoring) at specific intervals as agreed

A written report on the delivery of the habitat management plan shall be submitted to the LPA at the completion of construction, and thereafter at 5-year intervals post construction. The report shall include an updated habitat management plan which incorporates recommended changes arising from the monitoring and the 5-yearly review.

The habitat management plan shall be carried out in accordance with the approved details.

REASON: A habitat management plan should be submitted to ensure necessary habitat management measures are agreed prior to commencement and implemented to ensure the site's habitat features are adequately managed long term in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

7. No development shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.

o Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

REASON: To ensure necessary management measures are agreed prior to construction and implemented for the protection of the environment in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

8. Notwithstanding the submitted details in regard to the seed mix for the grasslands, prior to the sowing and/or planting of the grasslands, details of the seeds and/or plants proposed shall be submitted to and agreed in writing by the Local Planning Authority. Development shall commence in accordance with the agreed details.
REASON: In the interests of enhancement of biodiversity in the immediate area in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).
09. Prior to the installation of the cesspit, details of the cesspit and maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. Prior to the use of the toilet facility, the cesspit shall be installed in accordance with the agreed details and retained for the duration of the use.
REASON: In the interests of protecting the hydrology of the groundwater in accordance with Policy GP5 and GP7 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).
10. Prior to the installation of any external lighting, details shall be submitted showing luminance impact on the wider area and the timings of when the lighting shall be used and how this will be controlled. The lighting shall be installed and retained in accordance with the agreed details.
REASON: In the interests of biodiversity in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).
11. The compensation areas must be implemented as shown on the drawings and documents below in accordance with the timetable as shown on Figure 3 Grassland Compensation Area Vegetation Clearance (Drawing ref: 293651-LD-XX-DR-0403 Rev 4):

- Figure 3 Grassland Compensation Area Vegetation Clearance (Drawing ref: 293651-LD-XX-DR-0403 Rev 4)
 - Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy (Ref: 293651-ARP-XX-XX-RP-YE-0002 Rev 3 - 12 December 2023)
 - Figure 4 Proposed Landscape and Habitat General Arrangement (Drawing ref: 293651-LD-XX-DR-0001 Rev 5)
 - Figure 5 Existing Conditions and Vegetation Lost and Retained (Drawing ref: 293651-LD-XX-DR-0002 Rev 2)
 - Ecological Impact Assessment (EclA) (Ref: 293651-ARP-XX-XX-RP-YE-0001 Issue 002 - 12 December 2023)
 - Dormouse Conservation Strategy (Ref: 293651-ARP-XX-XX-RP-YE-0004 Rev 2 - 12 December 2023)
 - Two-staged Vegetation Clearance Method Statement (Ref: 293651-ARP-XX-XX-RP-YE-0005 Issue 002 - 12 December 2023)
 - o Vegetation Clearance Method Statement
- Once implemented the compensation areas shall be maintained in accordance with the Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy (Ref: 293651-ARP-XX-XX-RP-YE-0002 Rev 3 - 12 December 2023).
 REASON: In the interests of ensuring the site is suitably compensated and mitigated in regard to onsite biodiversity in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).

NOTE TO APPLICANT

The development shall be carried out fully in accordance with the proposals shown in the application and in the plans and particulars accompanying such application as varied and amended by this permission.

This decision notice is issued in respect of Planning Permission only and does not convey any decision which may be required under any other legislation or provisions, such as the Building Regulations. For advice on the requirements of the Building Regulations and allied legislation, and/or whether there is a need for a Building Regulations submission, please contact the Council's Building Control Section on 01633 656656 or email building.control@newport.gov.uk.

The development shall be carried out fully in accordance with the proposals shown in the application and in the plans and particulars accompanying such application as varied and amended by this permission.

Where there are conditions which require details to be approved prior to the commencement of development, failure to submit these details prior to commencement of development may result in the permission being invalidated.

01 The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Policies SP1, SP3, SP4, SP8, SP9, SP17, GP1, GP2, GP4, GP5, GP6, GP7, CE6, CE8, EM1, EM3, T4 and W3 were relevant to the determination of this application.

02 The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), (www.archaeologists.net/codes/ifa) and it is recommended that it is carried out either by a CIfA Registered Organisation (www.archaeologists.net/ro) or an accredited Member.

03 As of 1st October 2012 any connection to the public sewerage network (foul or surface water sewerage) for the first time will require an adoption agreement with Dwr Cymru Welsh Water. For further advice contact Dwr Cymru Welsh Water on 01443 331155.

Warning: A European Protected Species (EPS) licence is required for this development. This planning permission does not provide consent to undertake works that require an EPS licence. It is an offence to deliberately capture, kill or disturb EPS or to damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/ or receive an unlimited fine. Development should not be commenced until the Applicant has been granted a licence by Natural Resources Wales pursuant to Regulation 55 of the Conservation of Habitats and Species Regulations (2017) authorising the specified activity/ development to go ahead. To undertake the works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000, or at <https://naturalresources.wales/permits-and-permissions/protected-specieslicensing/european-protected-species-licensing/information-on-european-protected-species-licensing/?lang=en>. We may wish to discuss minor aspects of the proposed mitigation with the applicant in more detail at the EPS licence application stage. Please note that any changes to plans between planning consent and the EPS licence application may affect the outcome of the licence application.

CEMP condition They include: Potential queueing of vehicles on highway or backing up to highway (gate needs to be manned); Debris on highway (wheelwash facility needed); Safe access for pedestrians (segregate pedestrian access to site/private access).

No works shall take place on the site at all until a method statement comprehensively detailing the phasing and logistics of demolition/construction has been submitted to and approved in writing by the Council as Local Planning Authority. The method statement shall include, but not be limited to: Entrance/exit from the site for visitors/contractors/deliveries Temporary works to facilitate access from highway Location of directional signage within the site Parking for contractors, site operatives and visitors Temporary roads/areas of hard standing Details of street sweeping/street cleansing/wheelwash facilities Hours of working Phasing of works including start/finish dates For the avoidance of doubt all construction vehicles shall load/unload within the confines of the site and not on the highway. The development shall be carried out in accordance with the approved plan, unless otherwise agreed in writing with the Council as Local Planning Authority. Reason: To ensure that adequate on-site provision is made for construction traffic, including allowance for the safe circulation, manoeuvring, loading and unloading of vehicles, as well as parking, and to reduce impact on residential amenity and the general amenity of surrounding occupiers

04 The proposed development (including any demolition) has been screened under the Environmental Impact Assessment Regulations and it is considered that an Environmental Statement is not required.

05 It is considered that the decision has been made in conformity with the Marine Policy Statement (2011) and in accordance with marine national planning policy contained within the Welsh National Marine Plan (2019) as demonstrated in the assessment of this proposal.

Informative:

Any person carrying out the development to which this planning permission relates must display at or near the place where the development is being carried out, at all times when it is being carried out, a copy of any notice of the decision to grant it, in accordance with Schedule 5B

to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended and Section 71ZB of the Town and Country Planning Act 1990 as amended by Section 34 of the Planning (Wales) Act 2015.

Signed on behalf of the Council



Newport City Council
Regeneration, Investment and Housing
Civic Centre
Newport
South Wales
NP20 4UR

Tracey Brooks Bsc Hons Dip TP MRTPI ILM
Pennaeth Adfywio a Datblygu Economaidd / Head of Regeneration and Economic Development
Cyngor Dinas Casnewydd / Newport City Council

Application Number: 23/0878

Decision Date: 7th February 2024

IMPORTANT! PLEASE READ THE NOTES ON THE REVERSE OF THIS FORM

Notes for Applicants

TOWN AND COUNTRY PLANNING ACT 1990

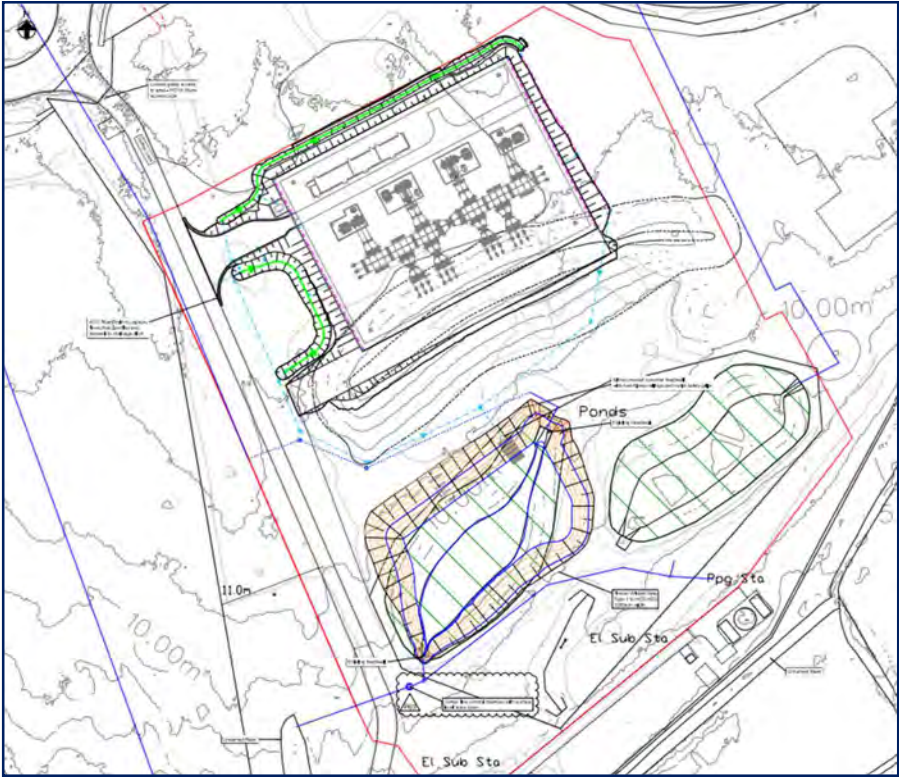
- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice, if you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of this notice.
- If an enforcement notice is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: 28 days of the date of service of the enforcement notice, or within 6 months [12 weeks in the case of a householder appeal] of the date of this notice, whichever period expires earlier.
- If this is a decision to refuse planning permission for a householder application and you want to appeal against your local planning authority's decision then you must do so within 12 weeks of the date of this notice.
- If this is a decision to refuse planning permission for a minor commercial application and you want to appeal against your local planning authority's decision then you must do so within 12 weeks of the date of this notice.
- If this is a decision to refuse express consent for the display of an advertisement and you want to appeal against your local planning authority's decision then you must do so within 8 weeks of the date of receipt of this notice.
- Appeals can be made online at: <http://www.gov.wales/planningappeal> (or <https://llyw.cymru/apelio-yn-erbyn-penderfyniad-cynllunio>).
If you are unable to access the online appeal form, please contact Planning and Environment Decisions Wales to obtain a paper copy of the appeal form on tel: 0300 0604400.
- The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances, which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning and Environment Decisions Wales (PEDW.Casework@gov.wales) at least 10 days before submitting the appeal. Further information is available on <https://gov.wales/appeal-planning-decision>.

Report: DISCHARGE PLANNING CONDITION 7
CONSTRUCTION ENVIRONMENT MANGEMENT PLAN.

Prepared By: Alex Gordon

Client: Welsh Government

Date: 5th August 2024



Report Revision

Version	Date	Author	Checked	Approved	Revision
00	05/08/2024	AG	RH	CJ	First Draft
01	09/08/24	AG	RH	CJ	Following Arup Comments

|DISCHARGE PLANNING
CONDITIONS

Newport City Council	Application No : 23/0878
Condition 7 – Construction Environmental Management Plan (CEMP)	
No development shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include: • Construction methods: details of materials, how waste generated will be managed. • General Site Management: details of the construction programme including timetable, details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain. • Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use. • Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan. • Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details. The CEMP shall be implemented as approved during the site preparation and construction phases of the development. REASON: To ensure necessary management measures are agreed prior to construction and implemented for the protection of the environment in accordance with Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).	

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1 INTRODUCTION

The site is currently undeveloped land within the Local Development Plan (LDP) allocated for employment use. The site is owned by the WG and located southeast of the existing Imperial business Park, Coedkernew, Newport. Imperial Park is a priority development site and is significant in economic development terms for the future developments of the semiconductor and tech cluster in West Newport. Celtic Lakes is part of the wider Imperial Park developments site. The application site area equates to approximately 4.25ha.

The proposed development will include 1no. proposed National Grid Electricity (NGED) substation (measuring approximately 96 x 70m) and associated vehicular and pedestrian access, landscaping and drainage. These works form part of the WG's future aspirations for the site's development in line with its allocation in the LDP for employment use. The proposals are also required to support the operations of the existing development and consented development north of the site, within the Imperial Business Park.

The substation enabling works covered by this CEMP will include:

- Surface Water Drainage
- Landscaping Works
- Highway Works
- Earthworks
- Utility Works
- General construction Works

An additional CEMP will be completed and submitted to cover the NGED works.

1.1 Revision History

This document is to be kept as a live document, reviewed and updated on a regular basis. Where changes are required within each phase of development, an updated CEMP will be shared or re-submitted to the Local Planning Authority.

2 CONSTRUCTION METHODS

2.2 Details of Materials

Topsoil and subsoil will be stripped, handled and stored with care for future use in the landscape and habitat creation scheme. Soil management will be undertaken in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites).

Aggregate will be to DMRB Standards for Highways, will be procured from the nearest available quarry (Hafod, Machen or similar) and delivered to site on road wagon.

Drainage Materials & ducting will be to DMRB Standards for Highways & CD 533. Manholes and headwalls will be precast concrete manufactured by Marshalls CPM/FP McCann (or similar). Covers and frames will be to BS EN 124 D400 Kitemarked. All ducts shall be installed in accordance with the pipe and bedding combinations given in Advice Note CD 533. Other combinations shall be supported by calculations in accordance with BS EN 1295-1 UK National. Bedding, backfill and surround material are classified in Clause 503 and 505.

Gabion mattresses to be 300mm depth, Enviromesh Gabion Mattress or equivalent product. Mattress to be BBA certified with a minimum design life of 120 years. Mattress mesh to be PVC coated galvanised wire in accordance with BS EN 10218-1:2012 and BS EN 10223-3:2013 with ultimate tensile strength of between 350 to 500N/mm².

Concrete will be delivered in concrete wagon and poured directly at the point of use. To minimise the risk of run-off entering any watercourse, plant will be cleaned within a designated washout area and a minimum of 20m from any watercourse. Wash water from grout and cement works must never be discharged into a watercourse. All powders including cementitious materials shall be stored in sealed bags, containers, or silos.

Road Pavements will follow the project Specification are based on the Specification for Highway Works (SHW), February 2016, issued by the Highways Agency. This specification refers to Series 700 of the SHW. The pavement designs are based on the version of the Design Manual for Roads and Bridges (DMRB) that was current in December 2022. Manual of Contract Documents Highway Works (MCHW) are used for pavement specifications. The pavement make up is as follows:

- Surface Course: Asphalt Concrete (AC), Stone Mastic Asphalt (SMA)
- Binder course and base: AC
- Sub-base: Type 1, Capping

Walters will adopt good construction management practices for the storage of Plant & Materials. The primary aim of this will be to reduce the risk of accidental discharge of pollutants into streams, rivers or ponds, or contamination of groundwater.

Walters will ensure in general:

- To avoid storage requirements, where possible material deliveries will be taken directly to their point of requirement on site.
- All materials and equipment will be positioned, stored, and stacked in an orderly manner within the footprint of the site.
- No stockpiling of storage of materials near sensitive areas.
- No compounds or storage areas will be located within 20m of retained watercourses including ditches.
- Segregation of rubbish and waste materials by categorisation and removal as it accumulates.
- Prohibited use of defective equipment.

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CONDITIONS

- Implement plant and equipment maintenance in accordance with manufacturers recommendations.
- Adequate storage arrangements for raw materials, products and wastes will be provided.
- An inventory will be maintained of substances on site which could have environmental consequences if they escape.
- Always have spill kits available.

2.2 Waste

Material deemed, under the waste management hierarchy, unsuitable for retention within the permanent works either directly, or following treatment, will be removed from the site. Such materials will be handled under an appropriate duty of care. All materials will be transported offsite using an approved licensed waste carrier to appropriately licensed disposal facilities. Records of all material and volume of material disposed offsite will be recorded included the disposal/treatment location. Haulage and gate tickets will be available for review during the works and the final volume and destinations will be presented.

All tippers and skips loaded leaving the site must be covered to eradicate debris being deposited on the public highway.

If any visual or olfactory evidence of previously unidentified contamination is identified during the enabling works, the work in the vicinity of the contamination will stop and the area demarcated until agreement has been reached with the Local Planning Authority & Project Manager on how the contamination should be addressed.

3 GENERAL SITE MANAGEMENT

3.1 Enabling Works Construction Programme

Key Dates (subject to change)

Enabling works start on Site – 09.09.24

Enabling works completion Date – 27.01.25

Terminal Float – 23 Days

Task	Week																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Site Setup	■																		
Erect Fencing	■																		
Trial holes	■	■	■	■															
Strip Topsoil			■	■															
Setup Overpumping			■	■															
Earthworks					■	■	■	■	■	■	■	■	■						
Drainage			■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Topsoiling Basin											■	■	■	■					
Headwalls, Gabions & Fencing to Basin													■	■	■	■			
New Utility Ducting												■	■	■	■	■			
Carriageway Works																■	■	■	■
Landscaping and Seeding														■	■	■	■	■	■
Finishes																	■	■	■
Completion Date																			■

3.2 Construction Drainage

The detailed design has been carried out in accordance with the CIRIA SuDS Manual C753, 2015, BS EN 752:2017, Sewers for Adoption 7th edition and DMRB CG501 where applicable

The works will consist of

- Drainage for enabling of Primary Substation
- Access road drainage
- Swales and filter drains around the base of substation
- Attenuation Basin expansion including headwalls and lining
- Hydrobrake chamber
- Manholes
- Pipes

Initial pond dewatering will be required to enable the works. During any dewatering, a SQE will oversee the works, to ensure that no fish are harmed. Additionally, pumps will to be screened with a suitable filter (as advised by an SQE) to ensure that fish do not become trapped.

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There may also be a requirement to divert any inflows around the pond to ensure it remains dry following the pond dewatering works. Should this activity be required it would be subject to its own risks and a separate method covered by a separate method statement.

The timing of the pond dewatering works is scheduled to avoid sensitive periods for fish and nesting birds, this would include avoiding the spawning period for coarse fish species between 15 May and 15 June.

The outfall to the south of the pond will continue to discharge as existing, retaining the 16.7l/s restriction to ensure that flows in the reën are not excessively strong.

3.3 Containments Areas

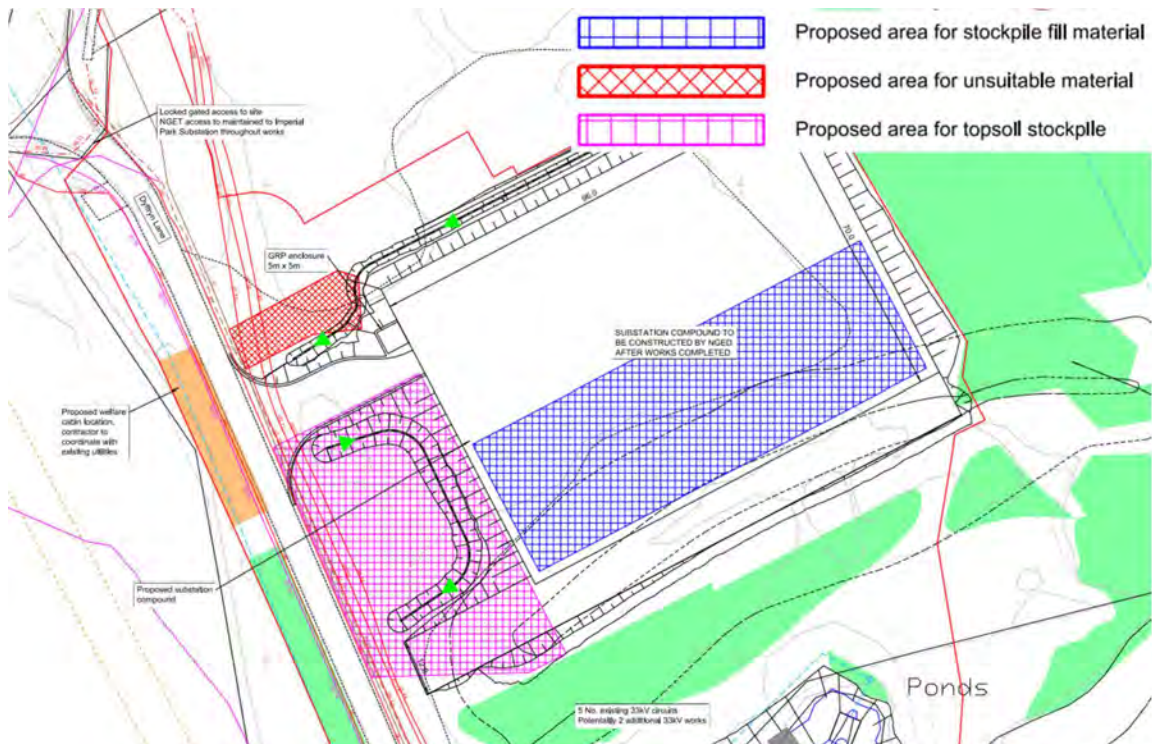


Figure 1 - Containment Areas for Materials

See sections 4.1 & 4.2 for fuel and waste containment.

No field ditches or reën will be directly affected by the Proposed Development. All development and/or construction activities are over 7m from field ditches and 12.5m from reën.

Site-specific methods to ensure that all site activities in proximity to watercourses and waterbodies will be undertaken in accordance with relevant legislation and undertaken in compliance with the relevant Guidance for Pollution Prevention (GPP) (e.g. GPP 5: Works and maintenance in or near water) and industry best practice (including that from the Construction Industry Research and Information Association (CIRIA), CIRIA C811 (previously C741) Environmental good practice on site guide, and during construction ecological supervision of the dewatering of the attenuation basin will occur.

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In advance of works commencing, silt fencing, silt busters or bales will be constructed to prevent silt or contaminants from being released into connecting watercourses.

3.4 Storage Area Buffer Zones

See Figure 1 for stockpile areas and their buffer zones.

No field ditches or reens will be directly affected by the Proposed Development. All development and/or construction activities are over 7m from field ditches and 12.5m from reens.

Routes of access tracks will avoid ecologically sensitive areas and efficient working strategy will minimise the extent of access tracks to avoid soil compaction.

Grassland will be retained where possible.

Construction will be phased appropriately to the landscape design; works will avoid tracking or storage of materials on the proposed planting areas, which will be fenced off.

Adequate space has been allowed for the storage of topsoil on site in bunds no taller than 2m, these are shown on the Proposed Site Layout drawing CG1012.

3.5 Watercourse and Surface Drains

In advance of works commencing, silt fencing, silt busters or bales will be constructed to prevent silt or contaminants from being released into connecting watercourses. No field ditches or reens will be directly affected by the Proposed Development. All development and/or construction activities are over 7m from field ditches and 12.5m from reens.

Surface water currently runs through existing drainage into an unnamed reen. This will be the case throughout the works and is incorporated into the final design.

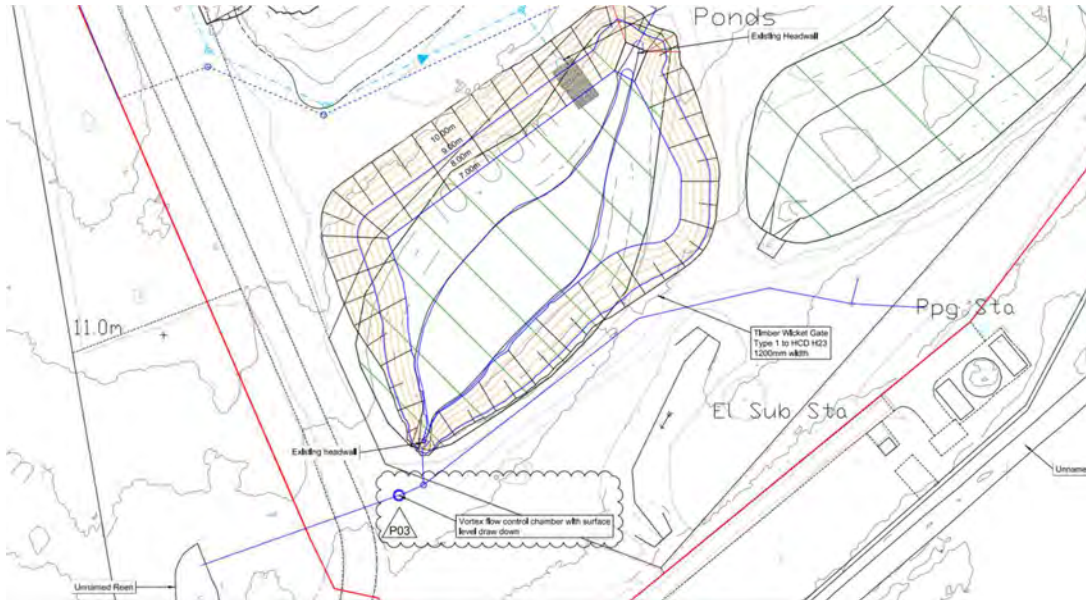


Figure 2 - Existing surface water drainage

The cleanliness of the water in the system will be closely monitored throughout.

4 RESOURCE MANAGEMENT

4.1 Fuel & Chemical Storage and Containment

All fuel and oil will be stored in accordance with the Control of Pollution (Oil Storage) (Wales) Regulations 2015, and they will be handled in such a way that risk of pollution is minimised, this will include:

- Fuel and oil storage tanks will be bunded and will be locked when not in use.
- All refuelling will be limited to designated areas, drip trays or an appropriately sized plant nappy will be used underneath where possible.
- Storage areas will not be located within 20m of a watercourse or highway gully.
- Minimum volumes of substances hazardous to the environment will be stored on site and at the workplace.
- All stored products will be appropriately labelled.
- Drums will be stored in bunded areas with a minimum capacity of 25% of the total volume contained within the bund, or 110% of the largest container, whichever is greater.
- Drums will be maintained in good condition, fitted with lids, and labelled to indicate the contents.
- Static combustion engine plant (e.g., compressors, lighting sets) will be integrally bunded or placed on drip trays.
- Plant will be regularly checked for leaks and will be regularly maintained via a formal monitoring programme. Any maintenance will be carried out at least 20m away from any watercourse or drain.
- Any mobile equipment such as small generators will be placed on plant nappies when in use.
- Spill kits will be provided within close proximity to fuel and oil storage, and any plant and equipment containing oil and operatives will be trained in their use. Used kits will be disposed of to appropriate facilities and promptly replenished.

4.2 Waste Generation and its Management

- Walters will minimise the generation of wastes during the works and shall maximise opportunities for the re-use of materials where possible. Walters will ensure appropriate minimisation and management of waste in the following ways:
- The production and maintenance of a Site Waste Management Plan for documenting the amount and type of waste that will be produced from the works and how it will be reused, recycled or disposed of.
- Just in time deliveries will be promoted to prevent the storage of large quantities of materials that will be sensitive to poor weather and storage conditions.
- Stores will be managed by the Works Manager who will manage distribution of materials.
- All materials will be stored securely and protected from the weather if required to ensure no materials are damaged or deteriorate.
- Only the quantity of materials required will be ordered to prevent the risk of 'over-ordering' and result in waste products.
- Complete and economical use of container contents (e.g., concrete curing/retarding agents, spray cans, sealants/mastics).
- Controlled storage and use of materials, including re-use of off cuts if possible.
- Waste skips will be provided with signage to dictate which segregated waste type belongs in each skip.
- Any material excavated and requiring disposal off site as waste will be characterised and will be removed from site by a licenced waste carrier, with associated Transfer note.
- Any imported filled material used for backfilling will be tested to confirm that it is chemically and physically suitable for its proposed use.

4.3 Water Consumption

When required, water will be obtained using a DCWW approved standpipe from a DCWW water valve by a trained operative and transported to site via a water bowser. Drinking water will be procured to supply the welfare facilities.

Any activities which require water (such as wheel washing) will take place in a bunded area, that has no pathway to any nearby watercourses including surface water drains. The contaminated water will be removed from the bunded area by a licensed waste carrier to a licensed waste carrying facility.

Contaminated water collected from sweeping of the live highway will also be transferred directly to a licensed facility and will not be stored anywhere on site for any length of time.

4.4 Energy Use

The welfare units will be powered by self-contained diesel generators.

Plant will use diesel fuel.

Diesel will be procured and brought via road lorry and contained on site in a doubled bunded fuel bower.

A towable bowser will be used to fuel plant where necessary.

5 POLLUTION PREVENTION

5.1 Relevant Guidelines

Site-specific methods to ensure that all site activities in proximity to watercourses and waterbodies will be undertaken in accordance with relevant legislation and undertaken in compliance with the relevant Guidance for Pollution Prevention (GPP) (e.g. GPP 5: Works and maintenance in or near water) and industry best practice (including that from the Construction Industry Research and Information Association (CIRIA), CIRIA C811 (previously C741) Environmental good practice on site guide, and during construction ecological supervision of the dewatering of the attenuation basin will occur.

In advance of works commencing, silt fencing, silt busters or bales will be necessary to prevent silt or contaminants from being released into connecting watercourses.

5.2 Emergency Spill Procedures & Incident Response Plan

Follow 'Environmental Emergency Plan' procedure which is detailed in the CPP and displayed within the welfare units. (appendix 1)

IN EVENT OF CHEMICAL / FUEL SPILLAGE

- Raise alarm immediately – (Inform member of WUK staff by mobile phone or radio)
- Contain spill if possible, by forming bund or blocking pathways to watercourses.
- Retrieve spill kit from nearest fuel bowser or mobile welfare unit.
- Use booms and mats to soak up spill. For large spills use kit to avoid further spread.
- Dispose of spoiled spill kit materials in sealed plastic bag via appropriate waste container. Report use of kit to Site Management to arrange replacement kit.
- Check all surrounding watercourses for any signs of contamination.
- Report incident to NRW.

IN EVENT OF SILT POLLUTION TO WATERCOURSE

For major incident raise alarm immediately – (Inform member of WUK staff by mobile phone or radio)

- Reduce pollution immediately, if possible, by forming bund, digging sump/ lagoon or blocking pathways to watercourses. If appropriate divert flows onto open land to promote settlement and protect watercourses.
- Retrieve silt traps / straw bales from nearest area.
- Use silt traps / bales / sediment to intercept flow and promote settlement of suspended particles.
- Flows may be diverted into major excavations to temporarily divert flows, though this should only be done following consent from WUK member of staff.
- Continue prevention measures until source of pollution is isolated or WUK staff arrive to control situation. Assist in permanent solution measures as directed.
- Check extent of pollution and assist in clean-up of aftermath if necessary.
- Report incident to NRW.

6 RESPONSIBLE PERSONS

6.1 Person responsible for CEMP activities

Site Manager – Rhys Huxton

The Site Manager is responsible for:

- Planning and coordinating the construction work from start to finish, including organising the schedule of work.
- Managing the construction site on a day-to-day basis, including inspecting work, overseeing quality control, and supervising workers.
- Preparing and communicating a Construction Management Plan describing arrangement for delivering the works.
- Ensuring compliance with the CEMP.

Site Engineer – Jacob Williams

The Site Engineer, working with the Site Manager is responsible for:

- Reviewing Risk Assessments and Method Statements (RAMS) submitted by the Contractor prior to beginning new works activities.
- Reviewing and monitoring the implementation of, and accuracy of, the CEMP.
- Monitoring of Contractor compliance with plans and procedures.
- Reviewing applications for environmental consents and permits in line with the Site Manager.

Environmental Manager – Alex Gordon

An Environmental Manager will be appointed by the Contractor prior to construction and will oversee the implementation of the CEMP including environmental control measures, mitigation and procedures.

The Environmental Manager will host regular meetings and undertake audits to review the operation and effectiveness of the CEMP. The results shall be reported by the Environmental Manager at monthly construction progress meetings and used to update the CEMP.

Ecological Clerk of Works – Eco-Vigour

An Ecological Clerk of Works (ECoW) will be appointed for the duration of construction. The ECoW is responsible for:

- Ensuring the Contractor is compliant with the CEMP.
- Inspecting the Contractor's work site.
- Monitoring or inspection of site activities in response to incidents, breaches of the CEMP or complaints received from a third party.
- Inspections of works to ensure that ecological mitigation measures incorporated into the design have been implemented.
- Implementation of corrective mitigation measures where proposed mitigation results in environmental effects over and above licenses or planning conditions.
- Ecological Clerk of Works should also ensure that work is undertaken in accordance with the EPS licence for the site due to the presence of Dormice.

|DISCHARGE PLANNING
CONDITIONSHealth & Safety Advisor – Neil Wheeler

A Health & Safety Advisor will be appointed to monitor health and safety risks and hazards in delivery of the construction works. The Health & Safety Advisor is responsible for:

- Ensuring the Contractor and the Proposed Development is compliant with health and safety legislation.
- Assisting the Site Manager and Site Engineer in reviewing and approving RAMS.
- Undertaking regular site inspections/ walkovers to ensure construction practice is compliant with best working practices and approved RAMS. The Health & Safety Advisor will have the authority to stop work where non-compliant working is observed.
- Managing emergency procedures.
- Providing health and safety advice to construction managers.
- Providing site inductions and Toolbox Talks on health and safety matters and sensitivities to the appropriate staff prior to works being undertaken.

6.2 Emergency Contact Details

Site Manager – Rhys Huxton – 07765 666302

Works Manager – Anthony Price – 07407 163439

Group HSE Manager – Neil Wheeler – 07468 723693

HSE Manager – Rob Crellin – 07468 723693

EcoVigour – 0844 840 0401

Natural Resources Wales – 03000 065 3000

7 APPENDICES

WALTERS

HEALTH, SAFETY & ENVIRONMENT PLAN

Environmental Emergency Plan	
Contract No : C****	Contract : Celtic Lakes
<u>IN EVENT OF CHEMICAL / FUEL SPILLAGE</u> • Raise alarm immediately - (Inform member of WUK staff by mobile phone or radio) • Contain spill if possible, by forming bund or blocking pathways to watercourses. • Retrieve spill kit from nearest fuel bowser or mobile accommodation unit at turbines. • Use booms and mats to soak up spill. For large spills use kit to avoid further spread. • Dispose of spoiled spill kit materials in sealed plastic bag via appropriate waste container. Report use of kit to Site Management to arrange replacement kit. • Check all surrounding watercourses for any signs of contamination.	
<u>IN EVENT OF SILT POLLUTION TO WATERCOURSE</u> • For major incident raise alarm immediately - (Inform member of WUK staff by mobile phone or radio) • Reduce pollution immediately, if possible, by forming bund, digging sump/ lagoon or blocking pathways to watercourses. If appropriate divert flows onto open land to promote settlement and protect watercourses. • Retrieve silt traps / straw bales from nearest area. • Use silt traps / bales / sediment to intercept flow and promote settlement of suspended particles. • Flows may be diverted into major excavations to temporarily divert flows, though this should only be done following consent from WUK member of staff. • Continue prevention measures until source of pollution is isolated or WUK staff arrive to control situation. Assist in permanent solution measures as directed. • Check extent of pollution and assist in clean up of aftermath if necessary.	
<u>EMERGENCY CONTACT NUMBERS</u> Site Manager – Rhys Huxton – 07765 666302 Works Manager – Anthony Price – 07407 163439 HSE Manager – Neil Wheeler – 07468 723693 Natural Resources Wales – 03000 065 3000	



Celtic Lakes, Imperial Park, Newport

Archaeological Written Scheme of Investigation

Prepared for Welsh Government by

**The Glamorgan-Gwent Archaeological Trust Ltd
(GGAT Archaeological Services)**

September 2023

**Project No. P2237
Report No. 2023/048**

NGR ST 28478 84073



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Document Control

Version	Author	Illustrations	Peer Review	Date approved
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002	ID/SLJ	n/a	MT	22 September 2023

Summary

Pre-planning application correspondence between the archaeological advisors to the Newport City Council and Arup as agents of the client, Welsh Government, has resulted in a recommendation for a written scheme of investigation (WSI) to be prepared prior to the construction of a new Bulk Supply Point and associated works at Celtic Lakes, Newport.

The Glamorgan-Gwent Archaeological Trust Ltd have been commissioned by Welsh Government through their agents Arup to prepare the WSI for the archaeological works.

This written scheme of investigation sets out the GGAT framework for the Archaeological Watching Brief and details procedures to be followed for finds recovery and sampling and the requirements for post-excavation works and reporting in order to fulfil professional obligations. The archaeological works will be carried out to the professional standards laid down by the Chartered Institute for Archaeologists' Standard and guidance for an archaeological watching brief (2014 updated June 2020).

Authorship and acknowledgements

The project was managed by Martin Tuck MCIfA (Head of Archaeological Services) and Sophie Lewis-Jones ACIfA (Project Officer). The WSI was prepared by Sophie Lewis-Jones and Isaac Derbyshire PCIfA of GGAT Archaeological Services.

Copyright notice

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Abbreviations

APM:	Archaeological Planning Management (GGAT)
GGAT:	Glamorgan-Gwent Archaeological Trust Ltd
HER:	Historic Environment Record (curated by the Glamorgan-Gwent Archaeological Trust)
ICON:	Institute for Conservation
LPA:	Local Planning Authority
NGR:	National Grid Reference
NMR:	National Monuments Record (curated by the RCAHMW)
NPRN:	National Primary Record Number (in NMR)
NRW:	Natural Resources Wales
PRN:	Primary Record Number (in HER)
RCAHMW:	Royal Commission on the Ancient and Historical Monuments of Wales

1 Introduction

1.1 Proposal and planning background

- 1.1.1 Welsh Government are undertaking a programme of the construction of a National Grid Electricity Distribution (NGED) 132/33/11 kV substation and associated infrastructure including access, landscaping and drainage (including expansion works to an existing attenuation basin). As previously determined, these works are located in an area of archaeological potential, and the archaeological methodology will be detailed in this written scheme of investigation (WSI).
- 1.1.2 GGAT were commissioned by Welsh Government, through their agents Arup, to prepare the WSI, which has been undertaken by the Archaeological Services department.

1.2 Site description

- 1.2.1 The proposed development lies to the south and east of the Celtic Lakes business development and directly south of Southlake Drive at NGR ST 28478 84073 (Figure 1). The site is an area of open scrub and vegetation at approximately 14m OD with two and attenuation ponds toward the south. A road to an existing substation marks the west boundary. The ground lies at approximately 10m OD and it is considered likely that mounds present on the site area result of up-cast earth from excavation of the ponds.

1.3 Archaeological Background

- 1.3.1 The area lies just north of the registered Historic landscape of the Gwent Levels (Ref number HLW(Gt)2). One asset, a church is first mentioned in the area of Pencarn in one of the c11th century charters attached to the Vita Sancti Cadoci (GGAT HER 00019g), which states that 'Ager Pencarnov' was granted by Gualluuir to Llancarfan, with Abbot Paul signing as first witness. This event is considered to be dated around c650-660. However, it is suggested that a more likely location for this church is at Coedkernew; the next farmstead west of Pencarn located at NGR ST 2761 8349.
- 1.3.2 There is also a potential effect on unknown archaeology, as the area has a likelihood of Iron Age, Roman and Early Medieval period activity. A favoured location for settlement for the earlier periods appears to be sites close to the interface of the alluvial deposits with the slightly higher solid geology inland.
- 1.3.3 An archaeological desk based assessment (Lewis-Jones 2021) was initially carried out in 2021 and covered a wider area than that for the current proposed substation. The DBA concluded that one asset was listed within the site (GGAT HER 00019g). However, it is suggested that a more likely location for this church is at Coedkernew, the next farmstead west of Pencarn located at NGR ST 2761 8349. Despite the uncertainty of the location, it concluded that there was the possibility of the church laying within the Site boundary. Along with this, in general in this area, early settlement patterns of the Iron Age, Roman and Early Medieval periods are seen to favour settlement on the higher solid geology close to the interface with the alluvial deposits of the Levels. This pattern suggested the possibility of unknown

archaeology in the area.

- 1.3.4 The recommendation arising from the DBA was; Preservation in situ is the preferred Welsh Government policy. If this is not possible, as a minimum, an archaeological evaluation is suggested.
- 1.3.5 Following similar recommendations from Cadw and GGAT (APM), further consultation resulted in a number of geotechnical test pits excavated across the site (aside from the very north due to ecological constraints) in the form of an archaeological watching brief (Owen 2023) carried out to details set out in the method statement (Tuck 2023).
- 1.3.6 The 24 test trenches largely encountered a natural stratigraphic sequence indicative of geological river terracing deposits, however the following was noted in six trenches;
 - Two trenches encountered hard material and in both drilling stalled
 - Two of the trenches revealed previous modern disturbance evidenced by the presence of slate or fragments of ceramic at a higher level
 - Two trenches clipped a thick layer of hard material, possibly concrete with stone inclusions. It was difficult to ascertain if they were part of one larger buried surface or structure but if they were, they may have represented a feature that extended at least 62m in length on a broad northwest/southeast alignment and in essence suggestive of a surface.
- 1.3.7 A complimentary Archaeological Impact Assessment (Lewis-Jones 2023) was also carried out, bringing together the results of the DBA, WB and various consultations. As a result of this, GGAT (APM) concluded that the results provided sufficient information so that should a similar application be submitted, GGAT APM would be likely to recommend a condition requiring a WSI detailing a programme of archaeological works, likely to take the form of an archaeological watching brief, be carried out. This current document fulfils that recommendation.

2 Specification

2.1 Purpose

- 2.1.1 The purpose of this WSI is to set out a quantifiable schedule of works against which performance, fitness for purpose and achievement of quality can be measured.
- 2.1.2 This WSI has been prepared to ensure that the work is undertaken to the standard required by the Chartered Institute for Archaeologists' *Standard and guidance for an archaeological watching brief* (2014 updated 2020).

2.2 Objectives

- 2.2.1 The objectives of this fieldwork are as follow:
 - An investigation of the potential archaeological resource through monitoring of groundworks;
 - The presentation of these observations to be set out in a written report;
 - The preparation of an archive of data recovered and records made as a result of the project, and the deposition of this archive in a suitable receiving museum (i.e. National Museum of Wales) or similar institution.

2.3 Scope

- 2.3.1 The watching brief will be carried out during any groundworks associated with the development.

2.4 Monitoring

- 2.4.1 The appropriate organisations will be given reasonable advance notice by the client of the commencement of works.
- 2.4.2 If necessary, site access will be afforded to the archaeological advisors, in order to observe any significant archaeological features that are identified within the excavations.

2.5 Timing

- 2.5.1 The archaeological works will commence following the notification of a start date for the works as provided by the client and one convenient for both parties. The watching brief is scheduled in phases;
 - Ecological clearance and mitigation works – Feb 24 – April 24
 - Civil Engineering enabling works – May 24 – October 24
 - Substation construction – November 24 – March 27

2.6 Nature of effect

- 2.6.1 A watching brief requirement has been identified for the proposed development comprising a National Grid Electricity Distribution (NGED) 132/33/11 kV, substation and associated infrastructure including access, landscaping and drainage (Burroughs, 2023). Without appropriate forms of mitigation, the following works activities are likely to have a potential impact on the archaeological resource:

- A flat area of hardstanding approximately 70m x 100m elevated on made ground above the prevailing ground level and flood plain by a maximum of 1.5m
- A substation compound encircled by a 3.6m high steel palisade security fence. A single brick-built switchgear building measuring 40m x 6m with a Plastisol coated sheet steel apex roof up to 4.6m in height.
- Various items of outdoor electrical equipment including wires, gantries and transformers up to approximately 6m in height.
- Any and all ground breaking activities.

3 Resourcing

- 3.1.1 If commissioned, GGAT Archaeological Services will provide the following input to carry out the specified archaeological works.

3.2 Staff

- 3.2.1 The project staff involved are experienced archaeologists drawn from the team regularly used. These will include:
- Martin Tuck MCIfA (Head of Archaeological Services), responsible for the management of the project and maintaining quality;
 - Project Officers(s), responsible for carrying out fieldwork.
 - Project Archaeologist(s), responsible for carrying out fieldwork.
 - Additional input will be provided by:
 - Project Archaeologists (finds), responsible for cleaning, cataloguing and analysing finds;

3.3 Specialists

- 3.3.1 Specialist expertise, if required, will be obtained from suitably qualified internal and external individuals. These specialists will be drawn from the following:
- Ceramic building material: Martin Locock (freelance)/Dr Edith Evans (GGAT);
 - Clay pipes: Charlotte James-Martin (Freelance);
 - Coins: National Museum Wales (NMW);
 - Conservation: Phil Parkes, Cardiff Conservation Services (Cardiff University);
 - Flints: Elizabeth Walker (NMW);
 - Glass: Joyce Compton (freelance);
 - Metalwork: Dr Mark Redknap (NMW) / Prof Bill Manning (freelance);
 - Medieval stone: Dr Mark Redknap (NMW);
 - Medieval pottery: Joyce Compton (freelance);
 - Metalwork and industrial residues: Dr Tim Young (Cardiff University and GeoArch);
 - Mortar analysis: Rob Dunning (GGAT);
 - Palaeoenvironmental remains: University of Wales Lampeter, Archaeological Services (UWLAS) / Wendy Carruthers (freelance) / QUEST Reading University;
 - Post-medieval pottery: Joyce Compton (freelance);
 - Prehistoric pottery: Jody Deacon (NMW);
 - Roman pottery: Joyce Compton (freelance)/ Peter Webster (freelance);
 - Roman brick and tile: Dr Edith Evans (GGAT);
 - Waterlogged wood: Prof Nigel Nayling / Dr Rod Bale (DendroArch/UWLAS (UWTSD)).
- 3.3.2 Further specialist expertise in other disciplines will be obtained as required

from suitably qualified individuals/institutions.

4 Implementation

4.1 Standards

- 4.1.1 The specified archaeological works will be undertaken to the highest possible standards in line with the requirements of the *Chartered Institute for Archaeologists' Standard and guidance for an archaeological watching brief* (2014, revised 2020).

4.2 Recording

- 4.2.1 During the works, all archaeological deposits will be recorded with a single continuous context numbering system. The archaeological contractor will, upon request, submit a copy of its recording forms and manual to the client.
- 4.2.2 Where appropriate, archaeological features will be drawn at a suitable scale in plan (usually 1/20 scale) and in section (usually 1/10 scale). All significant contexts will be digitally photographed, with a resolution of no less than 10 megapixels. Survey information will be related to the Ordnance Survey National Grid and levels related to the Ordnance Survey Datum.

4.3 Finds recovery and recording

- 4.3.1 All classes of finds will be cleaned and catalogued. They will be retained until arrangements for final deposition have been agreed, in line with the requirements of the *Chartered Institute for Archaeologists' Standard and Guidance for the collection, documentation, conservation and research of archaeological materials* (2014, updated 2020). If substantial quantities of undiagnostic, residual or modern material are recovered, an on-site recording and discard policy for these classes of find will be agreed.

4.4 Human remains

- 4.4.1 Should human remains be encountered, the Coroner will be immediately informed. The nature and extent of those remains will be established and recorded, but the remains will be left in situ, with suitable measures in place to ensure their protection during backfilling. Special circumstances may dictate the need to remove human remains if they are thought to be vulnerable to further damage or obstructive to the broader aims of the development works. In such cases, and in agreement with the archaeological advisor to the LPA, the human remains will be archaeologically recorded and removed under conditions that comply with all current legislation. This will include reporting to the relevant authorities, the obtaining of proper licences, and the provision for eventual reburial following appropriate analysis.
- 4.4.2 All human remains will be excavated by hand in accordance with the *Chartered Institute for Archaeologists' Excavation and Post-Excavation Treatment of Cremated and Inhumed Human Remains: Technical Paper Number 13* (1993).
- 4.4.3 Excavation of human remains will be subject to further negotiation as a variation to the contract.

4.5 Environmental sampling

- 4.5.1 The management of any environmental recording and sampling will follow the principles and tenets laid down in Historic England's (formerly English Heritage) *Environmental Archaeology: A guide to the theory and practice of Methods, from sampling and recovery to post-excavation* (2011). All deposits with a high potential for the preservation of palaeoenvironmental material will be sampled, by column, bulk and other method as appropriate, for possible subsequent analysis, in accordance with a sampling strategy overseen by a specialist with appropriate expertise.

4.6 Reporting

- 4.6.1 Following a review of the potential of the recovered evidence, a programme of analysis and research will be undertaken, resulting in the preparation of a report on the findings. A report is expected within 8 weeks of the end of the fieldwork phase subject to any specialist analysis. This will present a synthesis of the fieldwork data, together with contextualising evidence drawn from archaeological and historical sources. The report will include plans, drawings and photographs as appropriate, as well as supporting data as appendices if required.
- 4.6.2 A PDF version of the report will be supplied to the client.
- 4.6.3 Where appropriate, short archaeological digest reports will be submitted for publication in relevant regional, national and thematic learned journals. As a minimum, a report will be submitted to the annual publication of the regional CBA group or equivalent journal.
- 4.6.4 Non-technical reports may also be produced to inform the general public of the archaeological investigations, which could include web resources, posters, leaflets or other media forms.
- 4.6.5 A digital copy of the report and full archive will be deposited with the National Monuments Record (RCAHMW, Aberystwyth), and a digital copy of the report and archive index will be deposited with the regional Historic Environment Record, in accordance with the *Guidance for the Submission of Data to the Welsh Historic Environment Records (HERs)* (Welsh Archaeological Trusts, 2022).

4.7 Archive and finds deposition

- 4.7.1 An archive of archaeological records relating to the fieldwork will be prepared to the specifications in *The National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales* (National Panel for Archaeological Archives in Wales 2017).
- 4.7.2 The site archive will be deposited with an appropriate institution, or retained by the landowner, as required, in accordance with the ICON and the National Panel for Archaeological Archives in Wales guidelines (*The National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales* (2017)), and subject to the agreement of the legal landowner. The National Museum of Wales (NMW Cardiff) or Newport Museum will also be approached.
- 4.7.3 Any finds, including artefacts and ecofacts, excepting those which may be subject to the laws of Treasure Act (1996) and/or Treasure Order (DCMS 1996; 2002), will be deposited with the same institution, subject to the agreement of the landowner.
- 4.7.4 An agreement with an appropriate institution to accept this material will be made on completion of fieldwork and assessment of the nature of the finds recovered.

5 General

5.1 Insurance

- 5.1.1 The archaeological contractor should hold full insurance cover for this type of work including Professional Indemnity and Public Liability cover. Full details of these and other relevant policies should be supplied to the client on request.

5.2 Health and Safety

- 5.2.1 The archaeological contractor will provide to the client if requested a copy of its Health and Safety statement in accordance with *The Health and Safety at Work Act 1974*. The main contractor should prepare any documentation required by the *Construction Design and Management Regulations 2015*.
- 5.2.2 Prior to commencement of work, the archaeological contractor will carry out a formal Health and Safety Risk Assessment in accordance with *The Management of Health and Safety Regulations 1999*. A copy of the risk assessment should be kept on any site office and be available for inspection on request.
- 5.2.3 In addition to statutory requirements, the archaeological contractor should follow best practice for Health and Safety in archaeology as defined in the FAME (Federation of Archaeological Managers and Employers) *Manual of Health and Safety in Field Archaeology* (2010 and as updated).

5.3 General limitations

- 5.3.1 The work outlined in this specification will be carried out to the highest professional standards, and the conclusions drawn will be based on a considered review of the evidence available. However, the archaeological resource is unpredictable, and the encountering of unexpected archaeological deposits on the site cannot be ruled out. Where examination of such deposits is beyond the scope of the present specification, their investigation and analysis must be agreed by separate negotiation.
- 5.3.2 Should there need to be a variation to the provisions of the specification, this will be agreed in advance with the client and the relevant Authority (and/or their respective agents).

5.4 Quality control and standards

- 5.4.1 The archaeological contractor will carry out all works in accordance with the following Chartered Institute for Archaeologists' documents for conduct, regulations, and standards and guidance:
- Code of Conduct;
 - Regulations for professional conduct;
 - Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment.

5.5 Arbitration

- 5.5.1 Any dispute or difference arising out of a contract in relation to this work will be referred for a decision in accordance with the Rules of the Chartered Institute of Arbitrators' *Arbitration Scheme for the Chartered Institute for*

Archaeologists applying at the date of the agreement.

6 References

Legislation and technical guidelines

Cadw, 2007, *Caring for Historic Landscapes*. Welsh Government.

Cadw, 2007, *Guide To Good Practice On Using The Register Of Landscapes Of Historic Interest In Wales In The Planning And Development Process*. Welsh Government.

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Lewis-Jones, S, 2023. *Celtic Lakes, Imperial Park, Newport. Archaeological Assessment for proposed substation*. GGAT Report 2023/036

Owens, S, 2023. *Celtic Lakes GI works, Imperial Park, Newport. Archaeological Watching Brief*. GGAT Report 2023/029

Tuck, M, 2023. *Celtic Lakes Site, Coedkernew, Newport. Archaeological method statement for GI works*. GGAT Report 2023/022

Website

Burroughs Celtic Lakes

7 Glossary

Archive

An ordered collection of all documents and artefacts from an archaeological project, which at the conclusion of the work is deposited at a public repository, such as a local or national museum.

Assessment

A desk-based assessment is a detailed consideration of the known or potential archaeological resource within a specified area or site (land-based, intertidal or underwater). It consists of a collation of existing written and graphic information in order to identify the likely character, extent, quality and worth of the known or potential archaeological resource in a local, regional or national context as appropriate.

Brief

An outline framework of the archaeological situation that is to be addressed, together with an indication of the scope of the works that will be required.

Cadw

Cadw is the Welsh Government's historic environment service. Cadw are responsible for the planning issues which affect statutorily protected monuments and buildings. They also grant aid repairs to historic buildings and monuments and manage monuments which are in direct State care.

Field evaluation

A limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area or site; and, if present, defines their character and extent, and relative quality. It enables an assessment of their worth in a local, regional, national or international context as appropriate. The programme of work will result in the preparation of a report and ordered archive

Historic Environment Record (HER)

A documentary record of known sites in a given area. The HER is curated by the Curatorial Division of Glamorgan Gwent Archaeological Trust.

Natural

Archaeological term for undisturbed natural soils or geology on a site.

NGR

National Grid Reference.

RCAHMW

Royal Commission on Ancient and Historic Monuments of Wales, based in Aberystwyth.

Risk Assessment

A document prepared to meet the requirements of *The Management of Health and Safety at Work Regulations 1992* assessing all risks to the health and safety of employees and others arising from a work activity.

Specification

A written schedule of works required for a particular project (by a curator, planning archaeologist or client), set out in sufficient detail to be quantifiable, implemented and monitored. Normally prepared by or agreed with the relevant curator.

Watching brief

An archaeological watching brief is defined as a programme of observation, investigation and recording conducted during any operation carried out for non-archaeological reasons within a specified area or site, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme of work will result in the preparation of a report and ordered archive.

Welsh Archaeological Trusts

There are four Welsh Archaeological Trusts, Clwyd-Powys, Dyfed, Gwynedd and Glamorgan-Gwent. The Trusts were established between 1974 and 1975 in order to carry out rescue archaeological work in Wales. The Trusts are divided into Contracting and Curatorial Divisions. They are all charities but are also limited companies.



- Notes**
1. The details shown on the drawing are for Planning and are subject to approval by Newport County Council.
 2. All dimensions and chainages in metres (m) and elevations in metres Above Ordnance Datum (m AOD) unless noted otherwise. Do not scale from this drawing.
 3. Substation compound layout as provided by NGED on 14/06/2023.
 4. Additional substation and associated infrastructure shown outside of site boundary is subject to a separate planning application. Features shown outside of the site boundary are subject to further third party design and are not intended for consideration as part of this planning application.

- Legend**
- Planning Application Boundary
 - Steel Palisade Security Fence
 - Existing Attenuation Basin
 - Proposed Attenuation Basin
 - Proposed Drainage Ditch
- Hard Landscape**
- Asphalt Highway
 - Loose Gravel
 - Concrete slab
- Soft Landscape**
- Existing grassland to be protected and retained where possible
 - Existing habitats/landscape features to be protected, retained and enhanced
 - Other existing habitats potentially affected. Any habitats removed to be reinstated with mixed native woodland, scrub and understory planting
 - Proposed mixed native feathered trees
 - Proposed mixed native hedgerow planting

P02	11/08/23	JN	JN	DL
Re-issued following comments				
P01	28/07/23	JN	JN	DL
Issued for PAC				
Issue	Date	By	Chkd	Appd

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Client
Welsh Government

Job Title
Celtic Lakes

Drawing Title
Proposed Site Layout

Scale at A1 1:1000
Discipline Civils

Drawing Status

Job No 293651	Drawing No CG1012	Issue P02
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SAFETY HEALTH AND ENVIRONMENTAL INFORMATION - RESIDUAL HAZARD ASSESSMENT	
Notes below are additional to hazards / risks normally associated with this type of work:	
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Open water - existing attenuation basins present on site	Open water - existing attenuation basins present on site
Operations: 33kV underground cables present on site.	Dismantling / Demolition (Future) 33kV underground cables present on site.
Open water - existing attenuation basins present on site	Open water - existing attenuation basins present on site
These notes are based on the use of experienced and competent contractors carrying out the work using an approved safe method of working.	



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Welsh Government

Celtic Lakes Planning Support

Construction Phasing and Logistics Method Statement

Reference: 293651-ARP-XX-0002

P01 | 13 June 2024



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This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 293651-01

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Photographs

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No table of figures entries found.

Appendices

1. Introduction

1.1 Overview

This Construction Phasing and Logistics Method Statement (hereby referred to as the ‘Method Statement’) has been prepared to discharge a pre-commencement condition of the consented planning application reference (ref: 23/0878) relating to the proposed development of a substation and associated infrastructure at land southeast of Imperial Business Park, Coedkernew, Newport. The description for the application is as follows:

“The proposed development comprises a National Grid Electricity Distribution (NGED) 132 / 33 / 11 kV substation and associated infrastructure including access, landscaping and drainage (including expansion works to an existing attenuation basin).”

This document relates to pre-commencement condition number four of the planning consent, which is outlined as follows:

“No works (other than vegetation clearance) shall take place on the site at all until a method statement comprehensively detailing the phasing and logistics of construction has been submitted to and approved in writing by the Council as Local Planning Authority.”

This document has been prepared by Ove Arup and Partners Ltd (Arup) on behalf of Welsh Government (WG). It outlines the context and methodology of the development proposal, construction and logistics phasing.

1.2 Structure of the Construction Phasing and Logistics Method Statement

Newport City Council (NCC) requested that the Method Statement includes, but is not limited to, the following details:

- Entrance/exit from the site for visitors/contractors/deliveries;
- Temporary works to facilitate access from the highway;
- Location of directional signage within the site;
- Parking for contractors, site operatives and visitors;
- Temporary roads/areas of hard standing;
- Details of street sweeping/street cleansing/wheelwash facilities;
- Hours of working; and
- Phasing of works including start/finish dates.

Considering the above, the Method Statement is structured as follows:

- Section 2 provides a brief overview of the development proposals;
- Section 3 outlines the construction site access arrangements, the provision of construction parking, details of any local highway network arrangements, the hours of work and the phasing of works; and
- Section 4 provides a summary of the construction phasing and logistics methodology, including an overview of the proposed development’s compliance with local policy.

1.3 NCC Highways Planning Application Response

NCC offered no objection to the proposed development subject to conditions (as set out above). In their response, Highway Officer Kevin Jackson stated that the development impact would largely be confined to the construction period. Concerns associated with the construction period include:

- Potential queuing of vehicles on highway or backing up to highway (gate needs to be manned);

- Debris on highway (wheel washing facility needed); and
- Safe access for pedestrians (segregate pedestrian access to site/private access).

These comments have been taken into consideration within this Method Statement.

1.4 Newport Local Development Plan 2011-2026

This Method Statement aims to demonstrate that the proposed development is aligned with policies GP2 and GP4 of the Newport Local Development Plan 2011-2026.

GP2 relates to general amenity and states that any development will be permitted where, as applicable:

“i) There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality; ii) the proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area; iii) the proposal seeks to design out the opportunity for crime and anti-social behaviour; iv) the proposal promotes inclusive design both for the built development and access within and around the development, and; v) adequate amenity for future occupiers.”

GP4 relates to highways and accessibility and states that any development proposals should provide:

“i) Appropriate access for pedestrians, cyclists and public transport in accordance with national guidance; ii) be accessible by a choice of means of transport iii) be designed to avoid or reduce transport severance, noise and air pollution; iv) make adequate provision for car parking and cycle storage; v) provide suitable and safe access arrangements; vi) design and build new roads within private development in accordance with the highway authority’s design guide and relevant national guidance, and; vi) ensure that the development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network.”

2. Development Proposal

The proposed development is located to the southeast of Imperial Park, Coedkernew, Newport. The site is approximately 4.3 hectares of greenfield land. It is owned by the Welsh Government and secured by a padlocked gate. Figure 1 shows that the site is surrounded by other greenfield land and Dyffryn Lane, with the National Grid Imperial Park electricity substation located further south.

Regarding the wider area, Imperial Business Park is located at the north of the site and the residential area of Dyffryn including some local amenities is located at the east. To the west and south the site is bordered by greenfield land.



Figure 1 Site Location Plan

3. Construction Phasing and Logistics Methodology

3.1 Construction Site Access Arrangements

Vehicle Access Arrangements

The construction site will be accessed by vehicles via Dyffryn Lane to the west, which links to a roundabout to the north that connects to Celtic Way with further onward highway links to the A48 (approximately 720m north of the site). The access is currently gated with a padlock, and a continuation of this arrangement will be in place during the construction phase, where only contractors, delivery vehicles and other vehicles with permission will be allowed to enter.

The access will be manned by a worker who will ensure that only those who are permitted access the site. This worker will also be responsible for ensuring that vehicles do not queue and block the highway by directing operatives, contractors and visitors to the nearest available and appropriate parking, loading or unloading area. Visitors will also be permitted to utilise this access given they provide prior notification of their visit. Vehicles will exit the compound via this same arrangement.

Dyffryn Lane is approximately 5m wide and the proposed access to the construction compound will be wide enough to provide sufficient turning space for a transformer transporter to turn in and out of the site. Any temporary signal duties in the vicinity of the site access will be carried out by a certified person.

Pedestrian, Cycle and Public Transport Access Arrangements

There is no formal pedestrian access to the site at present from either Celtic Way or Dyffryn Lane, and it was not deemed necessary to facilitate pedestrian access to the site as part of the development proposals given the nature of the site's use.

Given the nature of the construction works taking place as well as the location of the proposed development, it is not anticipated that workers will travel to the site on foot and therefore the lack of wider pedestrian permeability is not considered to be a major issue. However, given the presence of some temporary external car parking adjacent to the site, it is considered necessary to provide a separate, temporary, pedestrian access to the site to separate pedestrians from large construction loads. This pedestrian access will also be located on Dyffryn Lane, though it will be set aside from the vehicular access.

Similarly, it is not anticipated that a significant number of cycling trips to/from the site will take place, however those who do choose to cycle can access the site on-road via Dyffryn Lane. They should then dismount their cycles prior to accessing the site via the dedicated temporary pedestrian access.

A temporary, secure cycle parking area will also be provided internally within the site.

Those travelling to the site via public transport are able to take advantage of the Celtic Way stops located approximately 920m north of the site on the A48 Celtic Way. The Celtic Way stops are served by the 30, 31A, 35 and 36 bus services. The 30 bus service provides a connection between Cardiff and Newport, whilst the 31A, 35 and 36 services connect onwards to Newport Bus Station. From these stops, those taking the bus can walk south on Celtic Way and Dyffryn Lane to access the site.

Signage Strategy

Temporary signage and traffic signs will be displayed both on the local highway network in the immediate vicinity of the site and internally within the site to manage and direct traffic to the appropriate areas of the construction compound.

Loading/Unloading Strategy

All loading and unloading of the plant, waste and construction materials will be carried out in designated areas internally within the construction compound. Any transport of the materials, plant and equipment shall not take place outside the construction hours and delivery vehicles would not be allowed to load/unload, wait or circulate on the highway.

3.2 Construction Vehicle Parking

There will be limited space for contractor, site operative and visitor parking within the site as shown in the context of the construction compound at Figure 2.

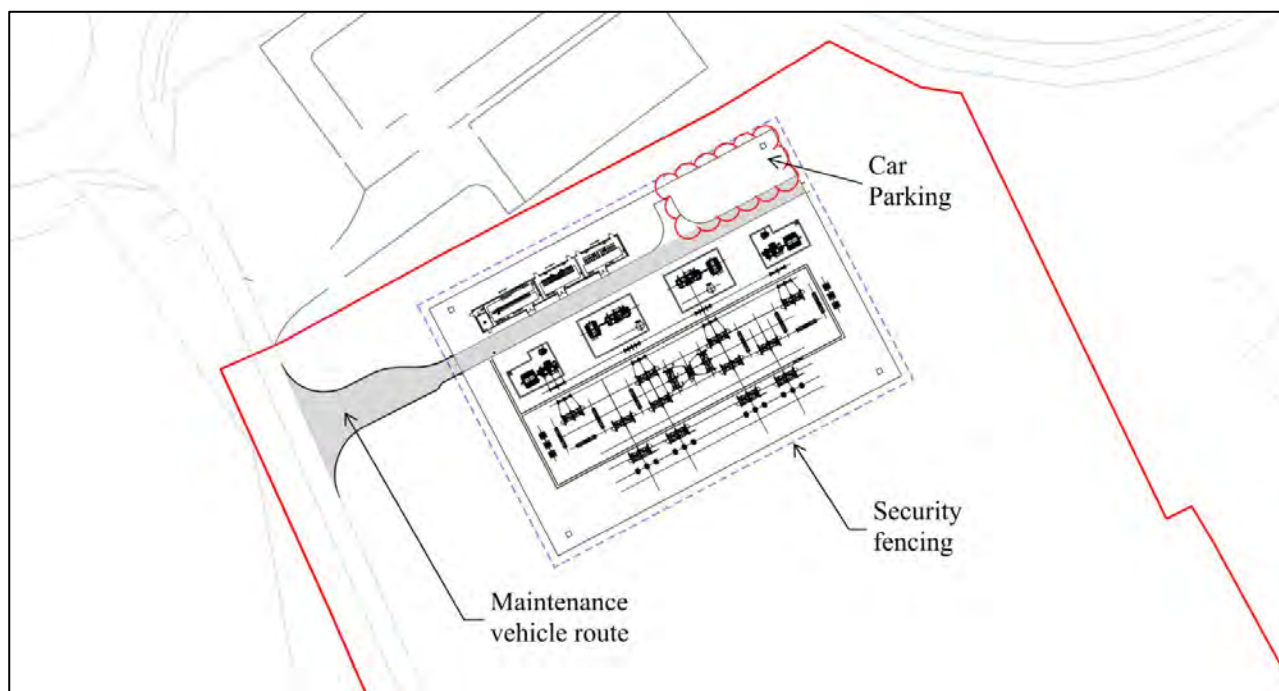


Figure 2: Internal Compound Car Parking arrangements

Any additional parking should take place on the west side of Dyffryn Lane adjacent to the site. Dyffryn Lane is a private gated lane which is not in public use, and as such this temporary arrangement is considered suitable. This external parking arrangement is shown in the context of vehicle movements to and from the site as part of the swept path analysis drawing provided at Appendix A.

3.3 Local Highway Network Arrangements

There will not be any temporary adjustments to the local highway network as part of the construction phase.

Visual inspections for debris and mud on the wheels will be undertaken for any vehicles leaving the site. If the wheels have collected any dirt and dusty materials, the wheels will be washed at the on-site jetwash facility then released before the vehicles enter the local highway network.

3.4 Hours of Work

Construction and associated activities will be carried out between 07:00 and 19:00, Mondays to Saturdays (inclusive). No works on Sundays or Public/Bank Holidays unless advanced agreement is given by NCC.

3.5 Phasing of Works

Site clearance works have started in 2024, with further construction works to be completed in 2027. No piling would be required due to the ground conditions. The main works include earthworks, general civil engineering and building construction and electrical works. Table 1 shows the indicative construction programme which may be subject to changes in the future.

Category	Timescale	Duration	Number of Operatives
Ecological clearance and mitigation works	February 2024 – May 2024	3 months	15
Civil engineering enabling works	September 2024-January 2025	4 months	25
Substation construction	January 2025 – March 2027	27 months	15

Table 1 Construction Programme

4. Conclusion

4.1 Policy Compliance

The development complies with GP2 of the NLDP 2011-2026, with the proposed construction phase's impact on amenity expected to be minimised by the proposed hours of operation. The impact on visual amenity will also be minimised by construction management methods including the inspection and washing of vehicle tyres.

The development complies with GP4 of the NLDP 2011-2026. Given the nature of the site use, access to the site for pedestrians, cyclists and public transport is not considered necessary, however appropriate provisions to the proposed construction compound will be made to facilitate safe and suitable access. Adequate provision for car and cycle parking is proposed, whilst it is also considered that the proposed development will not have a detrimental impact on highway or pedestrian safety in line with GP4.

The proposed development will be carried out in accordance with the approved plan, unless otherwise agreed in writing with the Council as Local Planning Authority.

4.2 Summary

This Construction Phasing and Logistics Method Statement has been prepared to discharge a pre-commencement condition of the consented planning application reference (ref: 23/0878) relating to the proposed development of a substation and associated infrastructure at land southeast of Imperial Business Park, Coedkernew, Newport. The description for the application is as follows:

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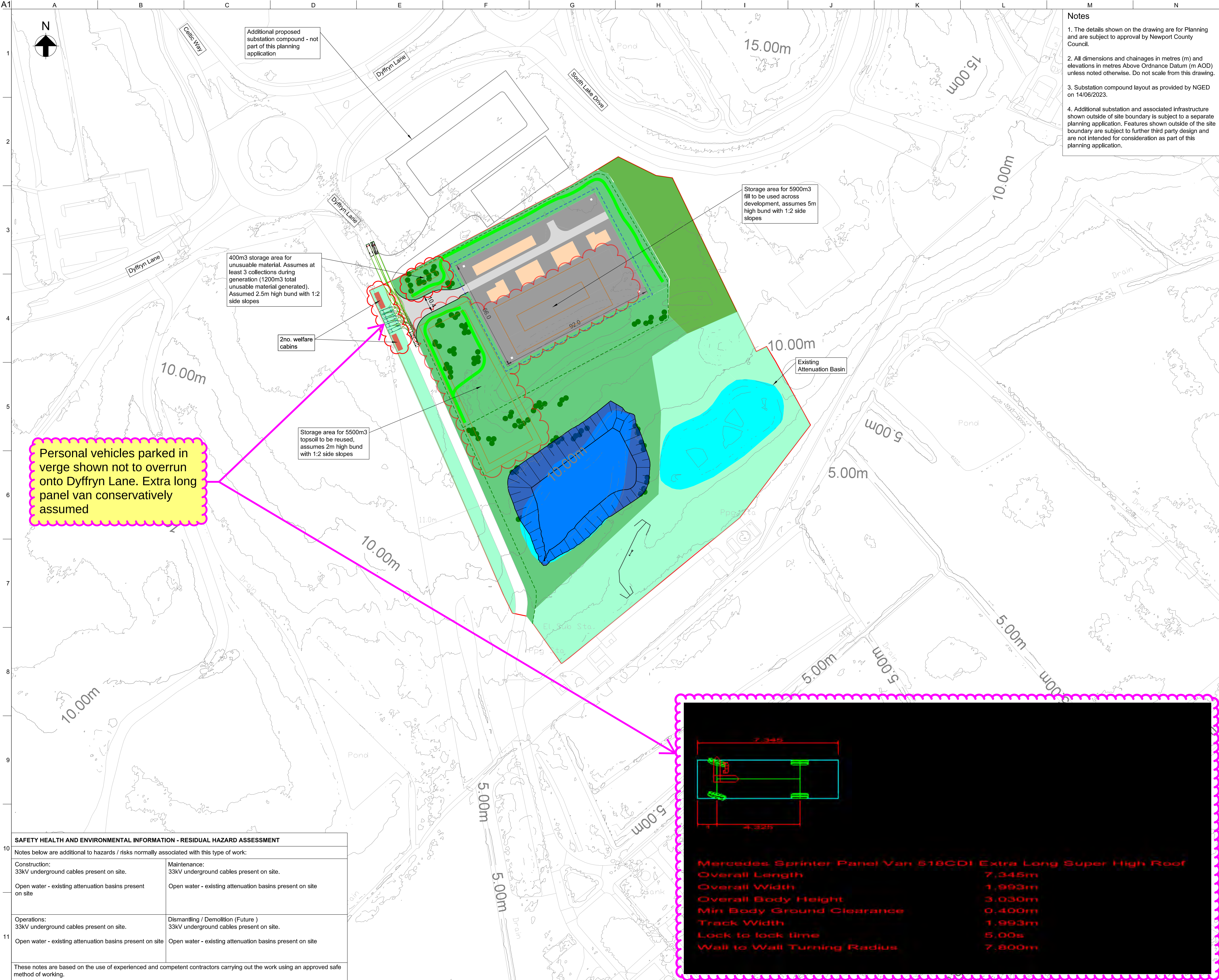
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This document outlines the context and methodology of the development proposal, construction and logistics phasing. This document satisfies pre-commencement condition four associated with the consented planning application 23/0878.

Appendix A

Construction Compound Extent and Personal Vehicle Tracking



- Notes**
1. The details shown on the drawing are for Planning and are subject to approval by Newport County Council.
 2. All dimensions and chainages in metres (m) and elevations in metres Above Ordnance Datum (m AOD) unless noted otherwise. Do not scale from this drawing.
 3. Substation compound layout as provided by NGED on 14/06/2023.
 4. Additional substation and associated infrastructure shown outside of site boundary is subject to a separate planning application. Features shown outside of the site boundary are subject to further third party design and are not intended for consideration as part of this planning application.

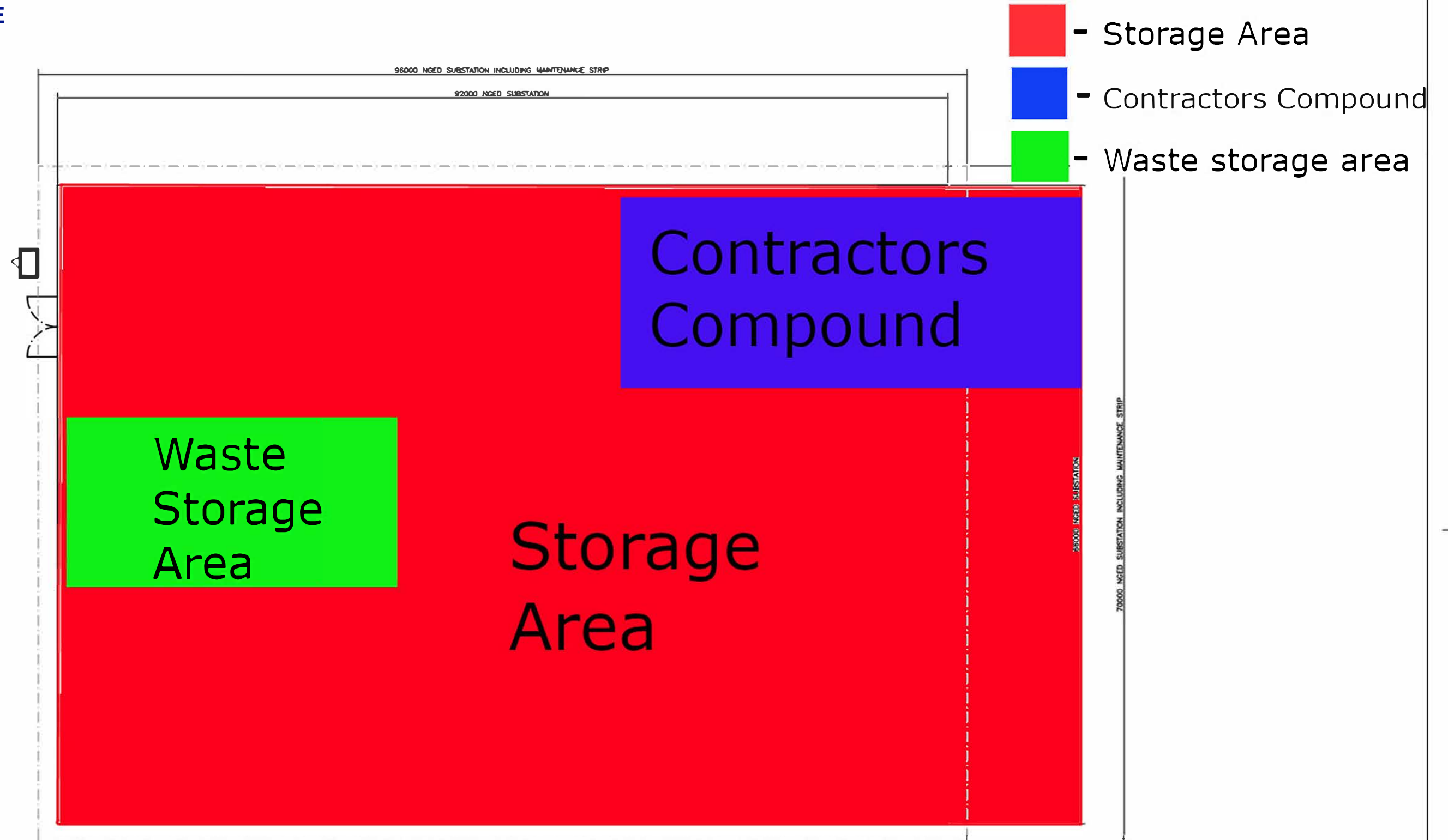
- Legend**
- Planning Application Boundary
 - Steel Palisade Security Fence
 - Existing Attenuation Basin
 - Proposed Attenuation Basin
 - Proposed Drainage Ditch
- Hard Landscape**
- Asphalt Highway
 - Loose Gravel
 - Concrete slab
- Soft Landscape**
- Existing grassland to be protected and retained where possible
 - Existing habitats/landscape features to be protected, retained and enhanced
 - Other existing habitats potentially affected. Any habitats removed to be reinstated with mixed native woodland, scrub and understory planting
 - Proposed mixed native feathered trees
 - Proposed mixed native hedgerow planting

SAFETY HEALTH AND ENVIRONMENTAL INFORMATION - RESIDUAL HAZARD ASSESSMENT		
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	These notes are based on the use of experienced and competent contractors carrying out the work using an approved safe method of working.	

Do not scale

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APPENDIX E



C	SP		27.02.24	OT1 & OT2 GA UPGRADED	ORIGINAL ISSUE	Date	 	Engineering Design (South Wales) Llanbry Wey, Cardiff CF3 2EQ
n	SP		04.06.24	LIGHT COLLARS AND OCTV COLLARS REPOSITIONED	Drawn	CJB		
C	SP		20.04.24	SIEMENS 1450V OT CB's ADDED & ADDITIONAL LIGHT COLLARS ADDED	Checked		Title Site Storage Appendix E	Dwg. No. NGED CL01
B	C/J2		23.07.24	REDRAWN TO SHOW CORRECT CB's AND STRUCTURES.	Approved			
A	SP		05.06.22	BS CVT's ADDED.	SCALE: 1:200			
Rev No	Drawn	Chk'd	App'd	Date	Revision	ORIGINAL SHEET SIZE: A1		

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