



Knotweed Management Plan

Produced by: The Knotweed Company Limited

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1. Site Details

Site address: Land off Swansea Road, Merthyr Tydfil CF48 1HS

Site description

The site is an area that has been formed by levelling a mound of colliery spoil. There are steep slopes up to the site from Swansea Road and also along the Eastern boundary, where a stream is located. There is housing on all sides of the site. The site is raised up above the housing to the East and North and the top of the site is approximately level with the housing to the West and South.

Proposed development and timescales

The site is due to commence development this year (2024) and will involve building houses and an access road into the site from Swansea Road. The majority of the level area on top of the site will be used for these works.

We initially visited the site for a preliminary discussion on the 11th January 2023, and did a full site survey (including taking soil samples) on the 15th & 16th February 2023.

Impact knotweed has on the development

There are three areas of Japanese knotweed located on site. One of these areas JK3, may be managed in situ, although recent disturbance (and spread) to JK3 may require this plan to be revised.

The largest area of Japanese knotweed (JK1) and JK2 are directly impacting upon the development and these will require significant works before the site can be developed. Jk1 specifically directly impacts upon the access route from Swansea Road and approximately 12 of the proposed dwellings. We would assess the impact of Jk1 on the proposed development as being significant. JK2 will also need to be fully excavated as the existing site slope needs to be re-profiled.

2. Japanese knotweed

Priorities

Identification of knotweed areas and prevention of further spread are essential priorities. The occurrences of Japanese knotweed on and adjacent to the site are detailed in the next section below.

- Areas of Japanese knotweed on site which require rapid treatment will be identified.
- Methods to prevent further knotweed infestation are detailed in Section 3 below.
- Replacement vegetation/habitat to be considered rather than just eliminating Japanese knotweed (as appropriate to the development proposals).
- Control methods which suit the location and timescale will be adopted (see 'Treatment proposals' below).
- Implementation will be based on the above information.
- Regular monitoring will be carried out as outlined in Section 5 below.
- Management will be revised in response to feedback from the above.

Location(s) and area covered

Japanese knotweed is present in two locations on the site. It is also present in one location on adjacent land (JK3). As of initial inspection (January & February 2023), the knotweed can best be described as follows:

JK01

Location on site	North-western corner		
OS Grid Reference	SO 02477 07075 <i>(at centre of knotweed area)</i>		
Description (maturity, height, peppered / stand / no. of stems, etc.)	Extensive, mature stand of Japanese knotweed. Large crowns present. Spread into adjoining scrub.		
Total area covered	Estimated as being 2,200-2,800m ² . Area is uncertain as it is probable that rhizomes extend further than normal into scrub woodland area.	Proximity to open watercourse (if applicable)	N/A
Proximity to nearest boundary (if applicable)	0m	Proximity to nearest proposed building (if applicable)	0m

JK02

Location on site	Northern bank opposite 79 & 80 Swansea Road		
OS Grid Reference	SO 02565 07093 <i>(at centre of knotweed area)</i>		
Description (maturity, height, peppered / stand / no. of stems, etc.)	Mature stand of Japanese knotweed. Growing on bank down to Swansea Road.		
Total area covered	25m ²	Proximity to open watercourse (if applicable)	N/A
Proximity to nearest boundary (if applicable)	<10m (bank too steep to measure more accurately).	Proximity to nearest proposed building (if applicable)	Estimated 12 metres

JK03

Location on site	Originally by culvert entrance under Swansea Road. However, disturbance in February 2023 will have spread viable parts of the plant in the working area, which may extend the length of the stream. This was subsequently re-assessed in June 2023.		
OS Grid Reference	Originally SO 02625 07100 <i>(at centre of knotweed area)</i>		
Description (maturity, height, peppered / stand / no. of stems, etc.)	Originally mature stand of Japanese knotweed located on edge of stream. In February 2023, works to the stream and culvert spread viable knotweed material across the working area. It is not known how far the spread has been.		
Total area covered	25m ² (originally). In June 2023, an area of peppered growth covering some 544m ² was recorded.	Proximity to open watercourse (if applicable)	0m
Proximity to nearest boundary (if applicable)	0m	Proximity to nearest proposed building (if applicable)	More than 20m

Treatment proposals

General

The various options available for the control of Japanese knotweed include in-situ herbicide treatment, combined treatment of digging and herbicide, excavation and stock-piling for future treatment (the bund method), excavation and burial on site, or excavation and removal off site. In some circumstances the installation of specialist root barriers may be required. It is not an acceptable option to consider doing nothing.

Where at all possible on-site remediation methods (herbicide, bund, burial) should be considered, as they are more sustainable as well as more cost-effective. In accordance with the Environment Agency's Knotweed Code of Practice, excavation and removal (so-called 'dig and dump') should always be seen as a last resort and should only be considered if no on-site methods are feasible to accommodate the proposed development scheme.

Herbicide treatment programmes take a *minimum* of 3 years to achieve completion (as per the EA Code of Practice) and often take longer. Under Property Care Association guidelines treatment should be followed by two full seasons without any new growth before a Certificate of Completion can be issued.

A herbicide programme consists of up to two herbicide treatments per year. During the first winter of the programme, the dead stems would usually be cut down to just above ground level (if required) and mulched. This allows better access to new growth and enables herbicide to be applied more efficiently in the following seasons. A fertiliser with a high nitrogen content would be applied to break down the mulched stems and to stimulate new growth to prevent the risk of the knotweed retreating into dormancy following the first year of treatment. During this visit it may be deemed necessary to carry out a cultural disturbance to the knotweed stand to help speed up completion.

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Site specific

Full excavation and removal to licenced landfill. Possible installation of specialist root barrier to site boundary (Swansea Road):

JK1 and JK2 are the main areas to address pre-development. The Japanese knotweed within these areas is both mature in nature and is very well established. Trial holes excavated in February 2023 revealed that knotweed rhizomes were principally present in the top 600mm of the ground, but also that rhizomes penetrated deeper in some locations. Rhizome depth will typically depend upon a number of factors, which include depth of the water table, ground make-up, voids in the ground, etc. We would typically expect therefore that rhizomes on this site might well reach a depth in some locations of 1.5-1.8m, however the bulk of the rhizomatous mass would normally be found in the top 5-600mm of the soil.

The proposed access to site goes through a significant part of JK1, and this and any proposed underground services under the road will need careful consideration before a detailed plan may be drawn up. Underground services will also need to be installed to the proposed dwellings and provision for these will also need to be made.

As the site levels in the area of JK1 are to be significantly reduced and as the existing slope in the area of JK2 is to be re-profiled, there is no other option then full scale excavation for both of the knotweed areas. We considered re-locating materials on site in either a bund or a cell burial, but no suitable location for this bulk of material exists, therefore removal from site is the only realistic option.

We have calculated that between 4,000 and 5,600 tonnes of Japanese knotweed impacted waste will need to be removed as controlled waste. Soil samples have been taken and submitted to several landfills for acceptability and budget costings. The samples showed that the waste was not classed as hazardous and prices for its removal into landfill have been obtained.

A necessary preliminary to the above works would be treating the knotweed with a non-residual herbicide to reduce the viability of the knotweed rhizomes. Two applications were carried out in the 2023 season and a further application will be made in 2024.

The residual risks of this site would include inadvertent damage to the root barrier during or post construction and not extending the excavation far enough to include all the rhizomes. Complications may also be caused by the uncontrolled spread of viable knotweed material, such as may have already occurred with JK3.

Herbicide management plan:

Under the Plant Protection Products (Sustainable Use) Regulations 2012, we have a responsibility to identify the most appropriate method of controlling the knotweed, to minimise the risk in applying that method while maximising the effectiveness of the method chosen. Where herbicide is used, there is a requirement to keep as low as is practicable the quantity of product applied in locations such as roads, railways, on permeable surfaces or other locations where there is a high risk of run-off into surface water or sewage systems, in conservation areas, near healthcare areas or in areas used by the general public or vulnerable groups. We have a responsibility to operate in accordance to The Amenity Standard by

minimising the use of herbicides etc. and, in line with the principles of Integrated Weed Management, maximising the level of control while minimising the use of labour and machinery.

Having considered the economic cost, environmental impact and the likely carbon footprint of all methods available to us, we believe a targeted use of a low risk herbicide will be the most appropriate means of proceeding for both JK2 and JK3.

Actions planned:

Knotweed area	Control method	To be carried out by
JK01	Preliminary herbicide treatment in 2023 to reduce the viability of the rhizomes and crowns. Full excavation and removal to landfill.	The Knotweed Company/Main contractor
JK02	Preliminary herbicide treatment in 2023 to reduce the viability of the rhizomes and crowns. Full excavation and removal to landfill.	The Knotweed Company/Main contractor
JK3	Manage through a long term herbicide programme.	The Knotweed Company
All site	Annual monitoring in growing season to assess for knotweed growth.	TBD

JK3: June re-assessment following earlier disturbance.

During our preliminary assessment in January 2023, we originally assessed JK3 as being some 25m² of mature growth located in one location along the stream approximately where the stream entered a culvert under the Swansea Road.

During our formal survey in February 2023, we found a contractor was working along the stream bed and had significantly disturbed the Japanese knotweed area (JK3). Loose rhizomes were visible in the working area. We spoke to the team on site, and they said that they knew about the knotweed and had put the growth to one side. At the point they indicated were some knotweed stems and rhizomes, but these would only have been an insignificant proportion of the knotweed stand. We spoke to the team again and advised them to ensure that all machinery, etc. was thoroughly decontaminated before leaving the site.

We re-attended the site on the 7th June 2023 to reassess this area.

We found a spread of Japanese knotweed over approximately 544m² on both sides of the stream where works had been carried out. It is quite possible that more growth will subsequently emerge. The growth was a mixture of peppered and semi-mature growth.

3. Site Hygiene

Japanese knotweed can regenerate from small fragments of itself and therefore site hygiene around knotweed material is essential to prevent further spread of the plant. The following procedures/controls should be applied:

- No site clearance works to be carried out until the site has been fully inspected for knotweed by a suitably qualified or experienced person and any knotweed areas clearly identified.
- Japanese knotweed on site to be isolated by fencing to avoid disturbance during treatment. If the ground in proximity to knotweed is likely to be disturbed as part of the development works the isolation fencing should be extended to cover a wider area to protect rhizomes in the soil.
- If any knotweed is present on adjacent land the risk needs to be assessed and control measures implemented to prevent re-invasion of the site.
- Liaison with adjacent landowners to treat Japanese knotweed that poses a risk to the site is essential.
- Procedures to be put in place to ensure all imported materials are free from Japanese knotweed.
- Designated haul routes through site to be identified to avoid risk of contamination through accidental or deliberate movement of knotweed material.
- Training to be given to all site operators and contractors during development works to ensure they can identify the plant, understand their legal obligations and are conversant with site practices to prevent further spread. A poster to assist with the identification of Japanese knotweed is provided in Appendix VII below.

4. Responsibilities

Client details

Merthyr Valley Homes Limited, Ty Brychan, 22 Lansbury Road, Gellideg, Merthyr Tydfil, CF48 1HA

Contractor/Consultant details

The Knotweed Company Limited, Unit 3 Royal Oak Court, Royal Oak Way North, Daventry, Northamptonshire NN11 8PQ

Signing off KMP after treatment

Upon completion of the works, the following person is responsible for signing off the KMP:

Name: Brian Taylor

Company: The Knotweed Company Ltd

Position: Director

The management of the Japanese knotweed on site shall be overseen by the Site Manager and, in his absence, their deputy. The Management Plan, appendices and revisions of this Plan shall be kept for future site owners. The Management Plan should be read in conjunction with the Property Care Association *Code of Practice for the Management of Japanese knotweed* 2018, the Environment Agency *Knotweed Code of Practice* 2013 (revised) and the current guidance from Natural Resource Wales.

Date KMP last updated: 31st January 2024

5. Objectives

Definition of objectives

Measurable objectives and timescales for the planned control activities are to be established as follows:

Objective 1

Immediately contain existing Japanese knotweed on site and prevent future spread. Site hygiene and education of site personnel to be implemented.

Objective 2

Reduce the vigour of the Japanese knotweed (all stands) by applying suitable herbicides during the 2023 season and re-survey JK3 area following recent disturbance.

Objective 3

Enable development by working with the developer to remove sufficient soils from the JK1 area, to enable development. Contaminated knotweed soils to be removed from site as controlled waste to a licenced landfill site. Estimated time July - October 2024.

Objective 4

Continue monitoring whole site and treating JK3 during the years 2025 to 2032.

Objective 5

Verify that Japanese knotweed is not growing on all parts of the site within 10 years for at least two consecutive seasons.

Means of measuring success

The contractor and the Site Manager will have responsibility to monitor progress of the knotweed treatment programme. Monitoring will be carried out prior to any treatment on site to act as a baseline to enable measurement of future changes. Monitoring will be carried out every 4-6 weeks throughout the growing season or as agreed between the contractor and the client. The contractor and the Site Manager will agree the level of control achieved and the future treatment schedule. Documentation of the progress of the knotweed treatment at each affected area on site will be provided as part of the Herbicide Application Records (see Appendix II). If deemed necessary, a separate Application Record will be provided for each knotweed area.

Completion

[provide results of evaluation, works completed, preferably within 1 year of completion]

Appendix I – Site Plan



Blue outline indicates visible extent of the Japanese knotweed, however the rhizome spread beyond this (orange line) may vary between 2-7m. In the woodland/scrub area in part of Jk1 for example the rhizome spread would typically be greater than a more open area.



JK3 area as plotted in June 2023.

Appendix II – Herbicide Application Records
(to include evaluation of current growth and distribution)

The Knotweed Company Ltd – Site Visit & Pesticide Application Record

Technician: Paul Copper NPTC Cert.: 126097 NPTC Modules: PA1, PA6AW

Contract/quote number: TKC 3051 Date: 09-06-23 OFFICE

Site name: LAND OFF SWANSEA ROAD, M.T. DFIL.

Target plant(s): Japanese knotweed/Giant Hogweed/Field Horsetail/Bamboo/other (state below)

Weather: Clear / Cloudy / Light rain / Heavy rain Hot / warm / cool Winds: still / light / moderate / strong

PPE Worn: Gloves / overalls / spray suit / mask / visor / boots Warning signs displayed: Y / N

Works completed: Herbicide application / brush-cut / monitoring & inspection / survey / Watching Brief

Method of application: Knapsack / compression sprayer / stem injection / leaf/stem wiping

EA/NRW Licence number (if applicable):

Product used: Roundup Proactive (MAPP 17380)

Other (state product):

Application Rate: 5L/ha Qty of mix applied (l): 34 Total Product used (ml): 680

Description of target plant on site (tick all boxes that apply):

- | | |
|--|---|
| ☒ Mature stand | ☐ Semi-mature stand |
| ☐ Juvenile stand | ☐ Peppered growth |
| ☐ Bonsai/stunted growth | ☐ Showing signs of previous herbicide treatment |
| ☐ New growth | ☐ No visible growth – may still be viable rhizomes |
| ☐ Area has been disturbed | ☐ Requires winter brush cut |
| ☐ Brush cut to create an access path needed | ☐ Target plant is growing on an adjoining property |
| ☐ Living plant has been cut down by others | ☐ Site overgrown needs clearing |
| ☐ Target plant needs fencing off | ☐ Fly tipping on target area has occurred |

Average height of target plant: under 300mm / between 0.3 & 1m / 1-2m / Over 2m

Additional comments/other works:

Was a copy of this form left on site: Y [] N []

Was client contacted prior to this visit Y [] N []

Works completed satisfactorily Y [] N []

Technician signature:

Client signature:

Time of Departure:

Print name:

Paul Copper

www.jkweed.co.uk
June 2022

The Knotweed Company Ltd – Site Visit & Pesticide Application Record

Technician: Paul Copper

NPTC Cert.: 126097

NPTC Modules: PA1, PA6AW

OFFICE

Contract/quote number: TKC 3051

Date: 25-10-23

Site name: LAND OFF SWANSEA ROAD, M.T. DYFFIL

Target plant(s): Japanese knotweed/Giant Hogweed/Field Horsetail/Bamboo/other (state below)

Weather: Clear / Cloudy / Light rain / Heavy rain Hot / warm / cool Winds: still / light / moderate / strong

PPE Worn: Gloves / overall / spray suit / mask / visor / boots Warning signs displayed: Y / N

Works completed: Herbicide application / brush-cut / monitoring & inspection / survey/Watching Brief

Method of application: Knapsack / compression sprayer / stem injection / leaf/stem wiping

EA/NRW Licence number (if applicable):

Product used: Roundup Proactive (MAPP 17380)

Other (state product)

Application Rate: 50/ha Qty of mix applied (l): 23 Total Product used (ml): 460

Description of target plant on site (tick all boxes that apply):

- | | |
|--|---|
| ☒ Mature stand | ☐ Semi-mature stand |
| ☐ Juvenile stand | ☐ Peppered growth |
| ☐ Bonsai/stunted growth | ☒ Showing signs of previous herbicide treatment |
| ☒ New growth | ☐ No visible growth – may still be viable rhizomes |
| ☐ Area has been disturbed | ☐ Requires winter brush cut |
| ☐ Brush cut to create an access path needed | ☐ Target plant is growing on an adjoining property |
| ☐ Living plant has been cut down by others | ☐ Site overgrown needs clearing |
| ☐ Target plant needs fencing off | ☐ Fly tipping on target area has occurred |

Average height of target plant: under 300mm / between 0.3 & 1m / 1-2m / Over 2m

Additional comments/other works:

Was a copy of this form left on site: Y [] N [X]

Was client contacted prior to this visit Y [] N [X]

Works completed satisfactorily Y [] N []

Technician signature:

Client signature:

Time of Departure:

Print name:

Paul Copper

www.jkweed.co.uk
June 2022

Appendix III – Waste Removal Records (Haulage and Tipping)

Appendix IV – Useful Contacts

[main contractor contacts – site and office] – To be appointed.

The Knotweed Company Limited – *enquiries@jkweed.co.uk*

<i>Head Office:</i>	Unit 3 Royal Oak Court, Royal Oak Way North, Daventry, Northamptonshire NN11 8PQ
<i>Tel.:</i>	01327 703129
<i>Southern Office:</i>	4 Woodgreen Road, Harestock, Winchester, Hants SO22 6LH
<i>Tel.:</i>	01962 886060

Natural Resource Wales

<i>General:</i>	0300 065 3000 (Mon-Fri 9am - 5pm)
<i>Incident Hotline:</i>	0300 065 3000 (24 hrs)

Appendix V – Reference Material

Natural Resource Wales – website. ‘What you need to know’.

Environment Agency (updated 2013)

The Knotweed Code of Practice. Managing Japanese knotweed on development sites.

Environment Agency

Environment Agency (April 2019)

Treatment and Disposal of Non-native Plants: RPS 178

Environment Agency

The Property Care Association (2018)

Code of Practice for the Management of Japanese knotweed

Property Care Association

The Royal Institute of Chartered Surveyors (2012)

Japanese knotweed and residential properties

Royal Institute of Chartered Surveyors

Environment Agency and Cornwall County Council (2001)

Japanese knotweed. Guidance for householders and landowners.

Cornwall County Council

Child, L.E. and Wade, P.M. (2000)

The Japanese Knotweed Manual.

Packard Publishing Limited, Chichester. ISBN 1 85341 127 2

Welsh Development Agency (1998)

The control of Japanese knotweed in construction and landscape contracts: Model specification.

Former Welsh Development Agency, now part of the Welsh Assembly Government

Welsh Development Agency (1998)

The eradication of Japanese knotweed: Model tender document.

Former Welsh Development Agency, now part of the Welsh Assembly Government

Appendix VI – Photographs



Part of JK1 – before the dead canes were cut



Part of Jk1 – looking onto Swansea Road



Part of Jk1 – looking into the scrub area (more Japanese knotweed)



Edge of JK1 onto the site



Top of JK1 – operator is working at the edge of the stand



Soil sampling hole in JK1 area. Orange knotweed rhizomes visible throughout. Note main rhizome network in top 300mm.



JK2 on bank.

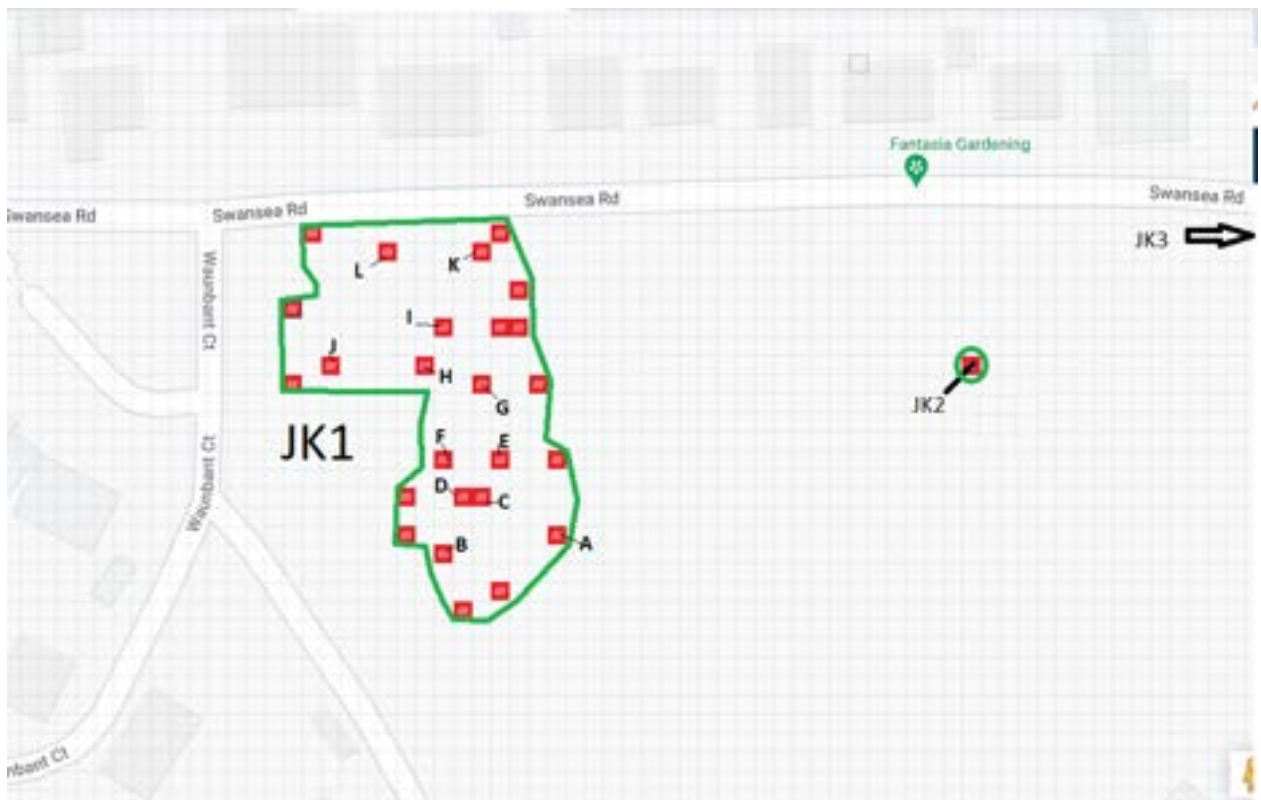


JK3 – scattered viable knotweed rhizomes, etc. across area. Surface shoots placed in circled area, rhizomes seen throughout working area.

Appendix VII – Soil sampling map and information

Site history: Land is essentially a levelled mound of colliery spoil. Land has been levelled in the past and planning permission sought for housing. Japanese knotweed is growing in three places in site. Only the large stand, JK1, will need excavating to a depth to be determined, but probably to 5-600mm depth before being capped with root barrier, the other two stands will be treated on site.

Samples were taken from different soil depths and locations as shown below throughout JK1. The majority of the sample holes found very stony ground quite quickly, little soil was present the fill being mainly colliery waste, stone and particles.



Map showing sample locations in JK1 area. No excavation works are planned in JK2 or JK3.

NB Soil test results supplied as a separate attachment.

Sample reference	Sample depth	Notes	Photograph numbers
A1	0.5-0.6m	Soil and JK rhizomes 0-0.5m, then progressively stonier. At 1.5m all stone and fragments, no JK visible at depth.	230,231, 232, 233
A2	1.5-1.6m		
B1	0.5-0.6m	Little soil, at surface 0-0.3m, ground stonier. Large stones at 1.3m. No JK seen at depth, all in top 1m or less.	374, 377, 378, 380
B2	1.1-1.2m		
C1	0.4-0.5m	Little soil, at surface 0-0.25m, ground stony. Large stones at 0.8m. No JK seen at depth, all in top 0.5m.	428, 429, 430
D1	0-0.3m	Little soil, at surface 0-0.2m, ground stony. Large stones at 0.6m. No JK seen at depth, all in top 0.4m.	447, 449, 450, 452
E1	0.1-0.2m	Little soil, at surface 0-0.3m, ground stony. Large stones at 0.8-1m. No JK seen at depth, all in top 0.6m.	453, 456, 459
E2	0.5-0.6m		
F1	0-0.3m	Little soil, at surface 0-0.2m, ground stony. Large stones at 0.6-0.8m. No JK seen at depth, all in top 0.3m.	466, 468, 471
G1	0.1-0.2m	Little soil, at surface 0-0.2m, ground stony. Large stones at 0.6-0.8m. No JK seen at depth, all in top 0.3m.	472, 474, 476, 477, 478
H1	0.1-0.2m	Little soil, at surface 0-0.25m, ground stony. Medium stones at 0.6-0.8m. No JK seen at depth, all in top 0.7m, larger rhizomes at this location then elsewhere.	479, 481, 482, 483, 484
H2	0.7-0.8m		
I1	0.6-0.8m	Little soil, at surface 0-0.6m, ground stony. Large stones at 1m. No JK seen at depth, all in top 0.4m.	485, 486, 487
J1	0.3-0.5m	Little soil, at surface 0-0.25m, ground stony. Large stones at 1m. JK all in top 0.8m, deeper rhizomes at this location then elsewhere on site.	488, 489, 490
K1	0.4-0.5m	Soil (clay) to 1m, then ground stony. JK in top 0.7m	491, 492, 493, 494, 495, 496
L1	0.4-0.5m	Soil and slate in top layer – 1.4m, then clay below. JK in top layer only.	499, 500, 501, 502, 503

Appendix VIII – Poster to assist with Japanese knotweed identification

Areas of knotweed on site will have been identified and, in accordance with Section 3 (Site Hygiene) above. All site personnel and contractors must respect the exclusion zones created around the knotweed and take care not to disturb any knotweed material.

In some cases it is possible that knotweed exists in other areas of the site that have not yet been identified, either due to being in a dormant state or having been disturbed by initial clearance works that were not subject to this Management Plan. Therefore all site personnel and contractors should be vigilant for any new knotweed areas and bring them to the attention of the Site Manager as soon as they are discovered. Any works in newly discovered knotweed areas should cease immediately until they can be evaluated by a knotweed specialist.

To assist with identification of new growth, as well as providing clarity on existing growth, the following poster has been provided to print out and display for the benefit of site personnel and contractors. We recommend the contents of Appendix VII forms part of the standard site briefing.



Identification of existing Japanese knotweed growth (above):

Leaves – shield shape; Leaf stems – zig-zag; Main stems – bamboo-like, green with red/pink speckles; Flowers (August/September) – tiny, creamy-white, formed in clusters.



Identification of emerging Japanese knotweed growth (above):

Shoots – red/pink, resemble asparagus spears; New leaves – red, gradually turning to green.

Identification of Japanese knotweed in the soil (below):

Crowns – knotty mass, top often visible, hollow stems (sometimes red/brown buds) emerging;

Rhizomes – dark brown, fleshy exterior, orange interior, snaps like a carrot.



The
Knotweed
Company
Ltd

www.jkweed.co.uk
01327 340770 (Head Office)
01962 886060 (Southern Office)

