



Street Works UK Guide

—
Material Classification Protocol

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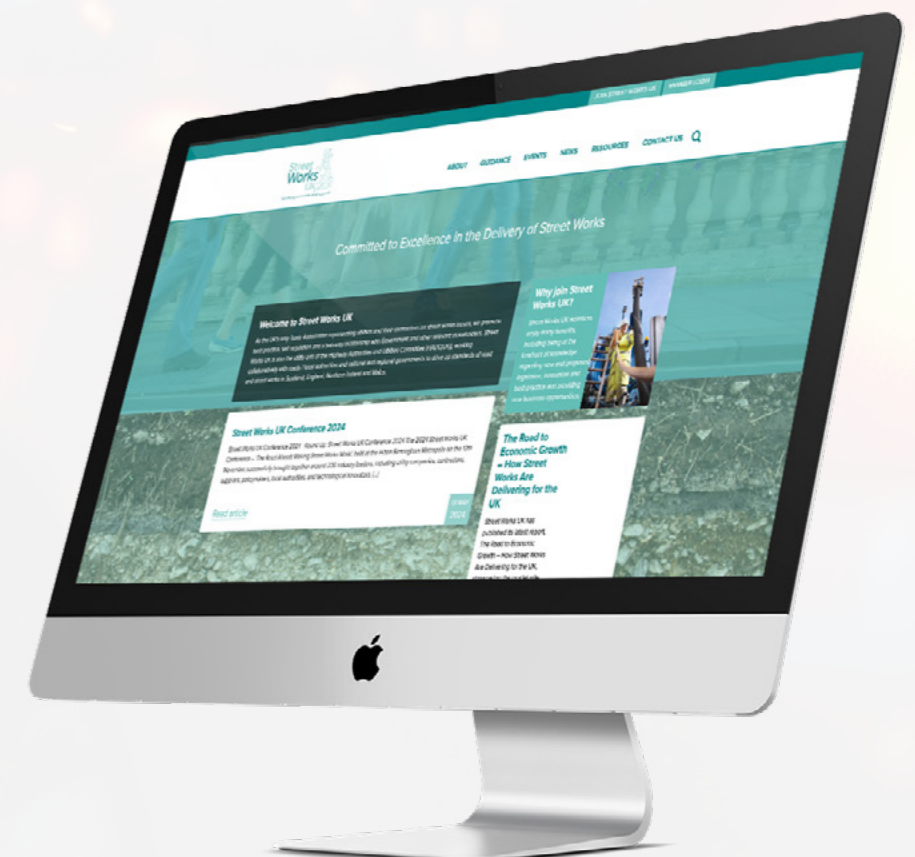
Who Are Street Works UK?

Street Works UK (SWUK) is the trade association representing utilities and their contractors on all matters related to street works. Its membership includes more than 70 organisations spanning the five key utility sectors: water, wastewater, gas, electricity, and telecoms/broadband.

Members include major infrastructure providers such as Cadent Gas, United Utilities, National Grid, Virgin Media O2, and Openreach, with strong representation across the UK, including devolved nations. Collectively, these organisations contribute around £14 billion in capital investment each year into the UK's infrastructure network.

Street Works UK plays a key role in setting best practice and driving consistency across street works operations, including the introduction of the new Material Classification Protocol.

streetworks.org.uk



Introduction & Background

A Unified Approach to Utilities Waste Classification

From 1st October 2025, the Environment Agency will fully implement the Street Works UK: Material Classification Protocol, marking a significant shift in how waste generated from emergency and standard utilities works must be assessed, recorded, and disposed of.

This new national standard replaces Regulatory Position Statement (RPS) 298 and 299, introducing a risk-based classification model that has been trialled and refined across the industry. With the new protocol, the aim is clear: greater consistency, environmental protection, and traceability.

Whether you're breaking ground in an emergency or conducting routine street works, your waste classification obligations are about to change, and Go Green is here to help you stay ahead.



Does This Apply to You?

Who Needs to Comply with the Protocol?

The new Material Classification Protocol applies to specific types of utility works. If your activities fall into one of the following categories, you must comply from 1st October 2025:

However, Planned Works or those requiring a Major Works Permit remain subject to the existing WM3 waste classification system, meaning these projects will still require full materials testing and documentation in line with Environment Agency standards. Understanding where your project sits in this framework is the first step toward compliance.

Standard Permitted Works

Emergency Utilities Work

Minor Works

Immediate Urgent or Immediate Emergency Works

Major Works where permit is required solely due to traffic management

Standard Permitted Works

These are medium-scale utility works that:

- Last between 4 to 10 working days.
- Do not require a Temporary Traffic Regulation Order (TTRO) (e.g. road closures or diversions).
- Are not part of a long-term operating programme.
- Require at least 10 days' notice to the local authority.
- May have reduced fees if done on non-traffic-sensitive roads or at non-sensitive times.

These are routine works like minor pipe replacements or telecom installations that don't significantly disrupt traffic.

Major Works Permit

These are large-scale or high-impact works that:

- Last 11 working days or more.
- Require a TTRO (e.g. road closures, diversions).
- Are part of a planned programme (e.g. annual operating plans).
- Require a Provisional Advanced Authorisation (PAA) at least 3 months in advance.
- Involve higher fees and stricter coordination with the local authority.

Examples include major gas main replacements, sewer upgrades, or fibre rollouts across multiple streets.



Emergency Works

Emergency works are typically initiated when there is:



- Gas leaks.
- Burst water mains causing flooding.
 - Exposed live electrical cables.
 - Collapsed sewers or manholes.



- Contaminated water supply.
- Fire risk due to damaged infrastructure.
- Structural failure of utility assets.



- Total loss of electricity, gas, water, or telecoms to a large number of customers.
- Damage to essential infrastructure (e.g. hospitals, care homes, transport hubs).



- Pollution incidents from utility infrastructure.
- Hazardous material spills from underground assets.

Minor Works

In UK utility street works, Minor Works are defined as low-impact, short-duration activities that typically:

- Last up to 3 working days.
- Do not require traffic management beyond basic signage or cones.
- Occur on non-traffic-sensitive streets.
- Do not require excavation deeper than a certain threshold.
- Do not require a Temporary Traffic Regulation Order (TTRO).

Examples of Minor Utility Works:

These might include:

- Replacing a small section of telecom ducting.
- Installing or repairing a single street cabinet or pole.
- Minor repairs to water or gas service pipes.
- Replacing a damaged utility cover or frame.
- Installing a meter or connection box.
- Minor reinstatement works following previous excavation.

Immediate Urgent Works

These are works that must be executed without delay to:

- Restore essential services (e.g. electricity, water, gas, telecoms).
- Prevent substantial financial loss to the utility provider.
- Avoid legal liability for delayed reconnection or service restoration.

Examples include:

- Reconnecting a customer's supply after an unplanned outage.
- Fixing a fault that would otherwise breach service-level agreements.
- Repairing a leak that isn't life-threatening but could escalate.

Urgent works are not life-threatening, but they are time-sensitive and cannot wait for the usual notice period. They must also be reported promptly to the local authority.

Immediate Emergency Works

These are works that must be carried out immediately due to a serious threat to life, property, or the environment. They are typically initiated without prior notice and include:

- Gas leaks posing explosion or fire risks.
- Burst water mains causing flooding or structural damage .
- Exposed live electrical cables .
- Collapsed sewers or manholes.
- Major telecom failures affecting emergency services or critical infrastructure.

These works are legally defined as those required to prevent or address danger to life or property and must be reported to the highway authority within 2 hours of commencement.

What Qualifies as Major Works Due to Traffic Management?

These works typically:

- Last fewer than 10 working days.
- Would otherwise be classified as Standard or Minor Works.
- Require significant traffic control measures, such as:
 - Full road closures.
 - Multi-way traffic signals.
 - Lane reductions on high-traffic roads.
 - Diversions through sensitive areas.
- Occur on traffic-sensitive streets or at peak times..

Even though the physical work may be minor or short-term, the impact on road users is substantial enough to warrant a Major Works classification.

Examples include:

- Repairing a utility asset located in the centre of a busy carriageway, requiring a full road closure.
- Installing or replacing infrastructure on a key junction or bus route
- Works near schools, hospitals, or emergency service routes where traffic disruption must be tightly managed.





What's Required Under the New Protocol?

Risk-Based Assessment and Accurate Reporting.

The cornerstone of the new approach is the Street Works UK Desktop Risk Assessment. This must be completed for every new excavation covered by the protocol, using the version-controlled template. In addition to this:

- 1% of all excavations (pro rata in 2025) must undergo full WM3 classification testing to verify the accuracy of risk assessments.
- Waste will be classified as either:
 - > Green: Non-hazardous, requiring a standard Waste Transfer Note (WTN)
 - > Red: Hazardous, requiring a Hazardous Waste Consignment Note (HWCN)
- Each assessment and waste movement must reference the appropriate Work Permit Number or Work Order Number, along with a clear excavation reference.
- All data must be uploaded to the Street Works UK portal quarterly, where sampling accuracy will be reviewed.

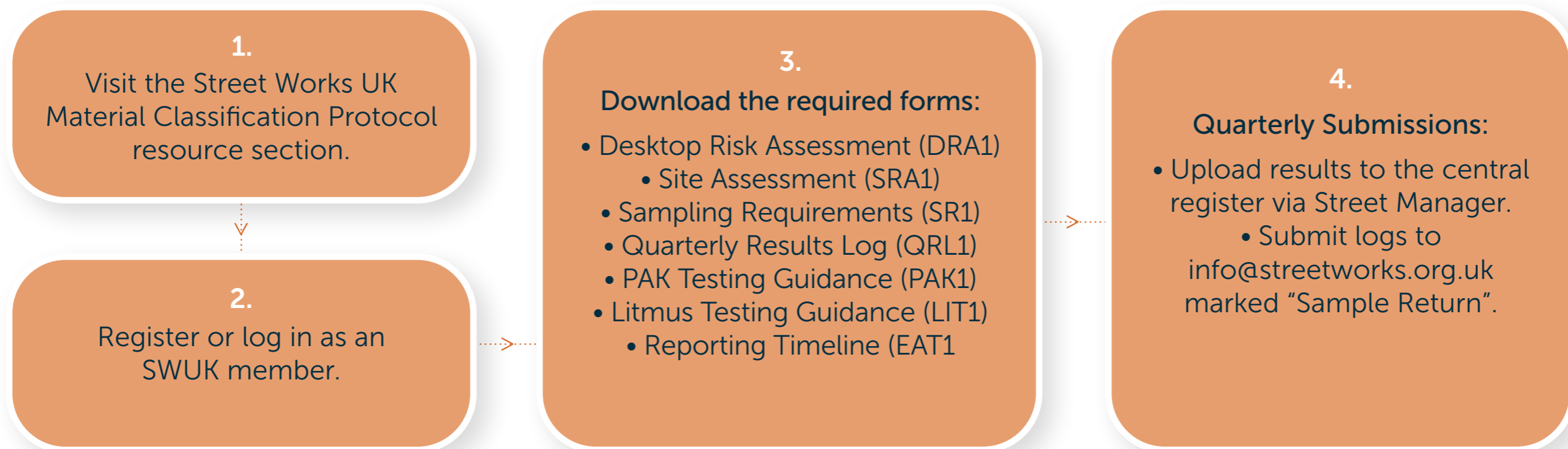
Performance Tiers	
>93% accuracy:	1% sampling
85-92.99% accuracy:	2% sampling
<85% accuracy:	3% sampling

Organisations with two consecutive quarters below 70% accuracy will be suspended from the protocol until a meeting with Street Works, and the EA, to decide on the continuity path forward.

Street Works Templates

There is a standard template that members are required to use for both the Desktop Risk Assessment and the Site-Specific Risk Assessment which are provided by Street Works UK. Only version-controlled templates should be used to ensure consistency across the industry.

Street Works UK: Material Classification Protocol:
[Click here](#)



Risk Assessments: Desktop

Based on guidance materials and the scope of the protocol, the Desktop template typically requires completion of:

1 Project Details

- Permit/Work Order number
- Location, date, and person completing the form

2 Historical & Site Context

- Land history (e.g., former industrial use)
- Known records (maps, GIS layers, previous testing)

3 Hazard Review & Identification

- Potential contaminants such as PAHs, petrochemicals, heavy metals, asbestos

4 Environmental Receptors

- Proximity to watercourses, sensitive ecosystems, schools, hospitals

5 Risk Pathways & Matrix Scoring

- Assess likelihood vs. severity to reach Low/Medium/High risk levels

6 Initial Classification Decision

- "Green" (Low risk) or "Red" (Moderate/High risk)
- Justification notes and supporting rationale

Utilities Excavation Waste Assessment



Desktop Risk Assessment

This risk assessment is to be completed before the site risk assessment is undertaken.

Utility Type:			
Date of Assessment:			
Location of work:	<input type="checkbox"/> Public	<input type="checkbox"/> Private	
Permit Number:			
Work Order Ref:			
Excavation Site Number			
Address:			
Post code			
Highway Authority:			
Works Type:	<input type="checkbox"/> Immediate	<input type="checkbox"/> Minor	
	<input type="checkbox"/> Standard	<input type="checkbox"/> Major (TM Only)	
Surface Location:	<input type="checkbox"/> Carriageway	<input type="checkbox"/> Footway / Footpath	
	<input type="checkbox"/> Verge	<input type="checkbox"/> Other	
Optional - What Three Words			

Table A – Central register check			
Is there a previous sample result recorded in the central register within 50m of where work is required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
What is the result captured?	Bituminous	<input type="checkbox"/> Green	<input type="checkbox"/> Red
	Sub-base	<input type="checkbox"/> Green	<input type="checkbox"/> Red

Table B – Screening Summary, tick boxes relating to the presence of certain sites within the boundaries given:				
Site Type	Answer			
	No	Yes - Within		
		< 10m	10-25m	>25m
Industrial / Manufacturing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas holder stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mining (coal, metalliferous)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Petrol stations / Garages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sewage Treatment Works	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sub-Stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste Site – Landfill & Treatment / Disposal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste Site – Scrapyard / Metal Recycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste Site – Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	L	H	M	L

Table C – Desktop risk assessment outcome		
<input type="checkbox"/> Low Risk	<input type="checkbox"/> Medium Risk	<input type="checkbox"/> High Risk

Assessor Name:	
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Utilities Excavation Waste Assessment



Site Assessment

This assessment is to be completed after opening the excavation and once relevant utility asset is exposed / ready for installation.

Utility Type:			
Date of Assessment:			
Location of work:	<input type="checkbox"/> Public	<input type="checkbox"/> Private	
Permit Number:			
Work Order Ref:			
Excavation Site Number			
Address:			
Post code			
Highway Authority:			
Works Type:	<input type="checkbox"/> Immediate	<input type="checkbox"/> Minor	
	<input type="checkbox"/> Standard	<input type="checkbox"/> Major (TM Only)	
Surface Location:	<input type="checkbox"/> Carriageway	<input type="checkbox"/> Footway / Footpath	
	<input type="checkbox"/> Verge	<input type="checkbox"/> Other	
Optional – What Three Words			

Question:	Answer:	Notes
Q1 Are there any signs of asbestos fibres or asbestos containing materials in the excavation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If asbestos / signs of asbestos are identified the excavation does not qualify for a risk assessment.
Questions – Asphalt / Bitumen Road Surfaces:		
Q2 Is the binder shiny, sticky to touch and is there an organic odour?	<input type="checkbox"/> Yes <input type="checkbox"/> No	All three (shiny, sticky and Creosote odour) required for a "yes".
Q3 Spray PAK across the profile (depth) of asphalt / bitumen. Does the paint change colour to Band 1 or 2?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Ensure to spray a line across the full depth of the bituminous layer. Refer to PAK colour chart.
Questions – All mobilised wastes / materials:		
Q4 Is the soil stained an unusual colour (such as an orange, black, blue, green)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Compare the discolouration of soil to other parts of the excavation.
Q5 If there is water / moisture in the excavation – is there a rainbow sheen / colouration to the water?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Looking for signs of oil in the excavation.
Q6 Are there any pungent odours to the material?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Think bleach, garlic, egg, tar, gas, pungent, sweet smells.
Q7 Use Litmus paper on wet soil, does it change colour to High or Low pH?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Refer to pH colour chart.

Assessment result(s):						
Bituminous	<input type="checkbox"/>	Green	<input type="checkbox"/>	Red	<input type="checkbox"/>	N/A
Sub-base	<input type="checkbox"/>	Green	<input type="checkbox"/>	Red	<input type="checkbox"/>	N/A

Assessor Name:	
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Risk Assessments: Site-specific

The Site template is typically filled during, or shortly after, excavation and includes:

1 Surface Checks

- Visual observations: staining, odours, asbestos fragments
- Physical conditions and weather

2 On-site Tests

- Litmus pH tests
- PAK marker spray test (recommended)

3 Field Re-classification

- Note any deviations from the Desktop result
- Update risk rating + classification (Green/Red)

4 Sampling Trigger

- If elevated risk is found, describe and trace sample taken for full WM3 lab testing

Waste Transfer & Onsite Segregation

New Standards for Waste Handling and Transport.

The protocol introduces strict requirements around segregation and movement of materials, both onsite and during transportation:

- Tarmac must be separated from all other excavated materials immediately at the point of breakout.
- Each Bituminous and Sub-base layer must be individually segregated and assessed.
- Waste streams should be stored separately onsite to prevent cross-contamination.
- If waste must be moved in a single load, efforts must be made to keep materials as segregated as reasonably practicable during loading and transport.
- Segregation must also be maintained upon tipping at the receiving facility.
- Maintaining proper segregation throughout the process ensures the classification remains valid and supports environmental compliance.

This additional layer of operational control helps ensure the waste classification remains valid from excavation to final disposal.





What About Non-Protocol Works?

Planned Projects Still Require Full WM3 Compliance.

If your project doesn't fall within the scope of the Street Works UK protocol, such as long-term planned works or major infrastructure upgrades, then full WM3 classification and compliant sampling remains your legal obligation.

These projects must follow:

- Complete materials testing
- EWC code assignment
- Production of WM3-compliant documentation
- Proper handling and disposal through licensed facilities

Non-compliance can result in regulatory penalties, so make sure you're applying the correct process for each type of work.

How Go Green Can Support You?

Your Expert Partner in Waste Compliance.

Go Green has supported infrastructure, construction, and utilities clients for over 20 years, providing dependable, data-led waste management solutions nationwide.

Our in-house Earthworks Team is ready to help you navigate these upcoming changes and stay fully compliant from day one.



We Offer:

Street Works UK Risk Assessment Support

Nationwide Material Testing

WM3 Sampling & Classification Services

Compliance Planning for Site Segregation

Waste Documentation & Reporting

Whether you're a local contractor or national utility provider, we'll help you stay compliant, reduce risk, and keep your sites moving.

Call: 01302 861136

Email: earthworksales@gogreen.co.uk

Visit: www.gogreen.co.uk

FAQs

Q: Does waste material need to be segregated by waste code type during storage?

A: **Yes**

Q: Is there a minimum separation distance on site between materials?

A: **No**

Q: Does waste material need to be segregated by waste code type during transportation?

A: **Yes**

Q: Will testing & classification be required once the waste reaches the receiver facility, similar to RPS 298 & RPS 299?

A: **No, once the Site Assessment is completed, the material is classified, and no further testing is required by a waste receiving site.**

Q: How will we share our sampling results with SWUK?

A: **There is a result log that will need to be updated for the samples you are taking. This will need to be shared with SWUK every quarter. Results should be returned to info@streetworks.org.uk.**

Q: Are the EA still mandating full laboratory testing, and not allowing rapid testing?

A: **Yes, there does need to be a project to assess the accuracy of rapid testing.**

Q: Do we need to use a defined suite of testing when sampling & testing the 1%?

A: **Testing suites are the same as those used in Phase 2 and 3; details can be found in the sampling requirements document.**

Q: Is the EA going to provide a grace period when the SWUK protocol comes in?

A: **There has been no official grace period discussed.**

Q: Can 'red' subbase be returned to the excavation as backfill (maybe with a soil stabiliser).

A: **Any material being put back into an excavation is not classed as 'waste' and therefore does not need to be classified by a SWUK site assessment.**

Q: Over what period will the first 1% sample testing need to be delivered? Is it 2025 calendar year?

A: **Sampling volume will be pro-rata from when you start using the SWUK protocol.**

Q: Are there any concerns about lab capacity for the volumes being talked about?

A: **Several laboratories were contacted to see if they could cope with expected volumes and at present there are no concerns on volumes being discussed.**

Q: Will the performance be measured by client company or at contractor level?

A: **SWUK requires results to be provided to them at Utility Organisation level as per promoter in Street Manager.**

Q: Do UKAS have to take the sample as well as testing it?

A: **No, a sample can be collected by a competent person.**



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