Broadgrove
PLANNING & DEVELOPMENT LTD

CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN

Highfields Apartments, Highfields Centre, New North Road, Huddersfield, HD1 5LS

San Pedro Properties

151/002
March 2025

Contents

1. Introduction

1.1. Broadgrove Planning and Development Limited have been instructed by San Pedro Properties Ltd (the applicant) to produce a Construction and Environmental Management Plan (CEMP) to discharge Condition 3 attached to planning permission under reference 2021/70/92291/W.

1.2. Condition 3 reads as follows:

"Prior to the commencement of development (including ground works) a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include a timetable of all works, any phasing of development, details of point(s) of access for construction traffic, vehicle sizes and routes, times of vehicle movements, parking for construction workers, signage, temporary drainage arrangements, pre-development road condition surveys, wheel washing facilities within the site, hours of works, details of dust suppression measures, details of measures to control noise and vibration from construction-related activities, details of artificial lighting to be used during construction, and details of the disposal of surface water from the development during the construction phase including methods to manage silt.

The development shall be carried out strictly in accordance with the CEMP so approved throughout the period of construction and no change therefrom shall take place without the prior written consent of the Local Planning Authority.

Upon completion of the development, post-development road condition surveys and a schedule of remedial works shall be submitted to and approved in writing by the Local Planning Authority, and the approved remedial works shall be carried out following the completion of all construction works related to the development."

1.3. This CEMP also includes Tree Protection Plan (TPP) measures to discharge Condition 21 attached to planning permission under reference 2021/70/92291/W. Condition 21 reads as follows:

"Prior to the commencement of ground works associated with the development hereby approved, a Tree Protection Plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the document so approved."

1.4. The approved development is for the conversion of 33 residential units at Highfields Centre, New North Road, Huddersfield, HD1 5LS.

1.5. The purpose of this Construction Environmental Management Plan (CEMP) is to outline the overarching details and principles in order to minimise, manage and/or mitigate the environmental effects of the works associated with the conversion to residential units at Highfields Centre.

1.6. The CEMP details the environmental management, controls and safety procedures that will need to be adopted during the development of the site, thereby providing a tool to ensure the successful management of the likely environmental effects as a result of the construction activities.

1.7. The CEMP seeks to ensure that all enabling, demolition and construction works cause the minimum disruption to the local residents, adjacent existing industrial properties, and members of the public. More specifically, the CEMP aims to:

- Ensure the relevant mitigation measures detailed as part of the planning application are implemented during all enabling, demolition and construction activities; and
- Ensure the relevant legislation, government and industry standards, and construction industry codes of practice and good practice standards are implemented.

1.8. This CEMP has been prepared to enable the Local Planning Authority (LPA) and third parties to understand the nature of the standard environmental management and control measures that will be implemented during the development of the site.

1.9. The principal contractor will refine the CEMP to ensure that the document is specific to the works and processes that are to be employed by contractors during all enabling, demolition and construction activities, thereby creating a site-specific CEMP for the development of the site.

1.10. The CEMP demonstrates the commitment of the applicant to undertaking the development of the site in such a way as to avoid or minimise environmental effects and disruption to neighbours (commercial and residential) and provides a mechanism for the implementation of recommended mitigation measures and monitoring throughout the works.

1.11. This CEMP will cover the following

- Site and surrounding area context: including description of the site, surrounding environment and proposed development, as well as environmental management structure, roles, and responsibilities;

- Any enabling, demolition and construction information: a description of the anticipated enabling demolition and construction works based on the information available to date, anticipated programme, working hours, details of haulage routes, equipment to be used;
- Environmental management and control measures: potential environmental issues related to the enabling, demolition and construction works, details of the site inspection and audit programme, methods for managing environmental risks and reducing impacts, emergency procedures, waste and hazardous materials storage procedures, liaison with the local community, and specific project environmental procedures relating to waste and materials management, dust and air quality, noise and vibration, vehicle management, protection of water quality; and
- Monitoring: procedures for recording and reporting monitoring results and taking remedial action in the event of any non-compliance.

2. Site and Surrounding Area

The Site

2.1. The site measures approximately 0.39 hectares in area and is located east of where New North Road (A629) meets Highfields Road.

2.2. The buildings on site were formerly used by Kirklees College for educational activities.

2.3. The site includes a hard surfaced yard, a car park, hard and soft landscaped areas within it curtilage. Within the curtilage, the site comprises Building A, Building B, link building and tower, and a toilet block.

2.4. Building A, Building B and the permitter railings including the gates and stone piers, are all Grade II Listed. Building A fronts New North Road and can be found under historic reference 1279306. Building B is a 2-storey Georgian building access from Highfields Road with historic reference 1313890. The railings are located on the site's New North Road and Highfields Road frontage and can be found under historic reference 1279329.

2.5. The site is within the Greenhead Park / New North Road Conservation Area and several buildings surrounding the site are Grade II Listed or of heritage value.

2.6. There are no trees within the site that are protected by a Tree Preservation Order, however there are trees of amenity value to the east of building B, and these are afforded protection by the site's Conservation Area status. The site is within an SSSI Impact Risk Zone.

2.7. Surrounding uses are predominantly residential, however buildings to the northwest (on New North Road) are in educational and office use. Nearby residential buildings include the terraced houses of 52 to 60 New North Road, and the flats of Highfield Court (the former Highfield Congregational Church) to the north.

2.8. The site slopes downhill from northwest to southeast and the site's car park is situated below the level of New North Road.

2.9. No public rights of way cross the site.

2.10. The site is located within a Development High Risk Area as defined by the Coal Authority.

Proposed Development

2.11. The proposed development comprises the conversion of former college buildings into 33 apartments including demolition of link canopy, partial demolition of link building, erection of

additional storey to link building, and internal and external alterations (Listed Building within a Conservation Area).

2.12. The site has a complex planning history and the most up-to-date planning application for the proposed development relates to a non-material amendment under reference 2022/NMA/90835/W. The amendment sought a revision to the plans for two of the second-floor apartments of a previous permission 2021/92291 for variation of condition 2 (plans) of previous permission 2019/90467.

2.13. The development involves the partial demolition of the link building and internal conversion of the existing building. There is a small outdoor amenity space to be produced for the new dwelling situated in the former toilet block.

2.14. For clarity, the approved site layout and ground floor plan is presented in **Appendix A**.

3. Construction Programme

3.1. The anticipated construction programme and description of works is outlined within this section as supplied by the client. As discussed in section one of this CEMP, once appointed, the principal contractor will update this section to make it specific to the works and construction methods they have been appointed to undertake.

Construction Period and Programme of Works

3.2. The indicative delivery programme for the development is approximately 3 years from commencement in May 2024 to a handover date of December 2026.

3.3. A phasing plan detailing the main phases of the development is outlined below.

Phase	Duration	Action	Timescale
Phase 1	1 year	Main building and clock tower	Complete by end of 2024
Phase 2A	2 years	Annex of 8 apartments	Complete by end of 2026
Phase 2B	2years	Janitors House (no.62)	Complete by end of 2026

3.4. Construction activities will likely overlap for work activities between different phases.

4. Responsibilities and Management Structure

4.1. The Construction (Design and Management) regulations 2015 (CDM regulations) came into force on 6th April 2015, replacing CDM 2007. As per the requirements of the CDM regulations, the applicant must appoint a principal designer and principal contractor prior to the commencement of works on site. Should the applicant fail to appoint either a principal designer or principal contractor, the applicant must carry out their duties in respect of the CDM regulations.

4.2. The roles and responsibilities of the applicant, principal designer, and principal contractor, as required by the CDM regulations, are outlined within this CEMP.

Management Structure

4.3. Responsibility for all environmental issues relating to the redevelopment of the site rests with the applicant, the principal designer and principal contractor appointed for the development. The principal contractor / project director will have the central role in managing safety, health, environment, and quality (SHEQ) issues during site activities. The principal contractor and all sub-contractors will have to implement the environmental management and control measures set out within the CEMP.

4.4. All works are to be carried out in compliance with the Construction (Design and Management) regulations 2015, current legislation and guidance, and the applicant's requirements.

4.5. The Principal Contractor will ensure that its Duty Holder responsibilities and other applicable legislation are complied with. Notably:

- To develop a Construction Phase Health & Safety plan;
- Carry out site inductions to all contractors and operators. These will include both site specific and industry standard rules and regulations;
- Project safety information will be displayed at site access and egress points, as well as site offices and welfare areas. This will include PPE requirements and details of site Health and Safety managers;
- As required, restricted site access to allow only authorised persons in by use of site security;
- Obtain risk assessments and method statements from all contractors engaged to work on the project, particularly where they may impact on others;

- Maintain the Safety Notice Board and the display of all Statutory Notices;
- Procure the appointment of competent designers or contractors as far as is reasonably practicable through the use of the supply chain management process;
- Monitor the health and safety performance of persons and companies working on the project;
- Maintain adequate levels of welfare facilities for the work force, including contractors; and
- Encourage an open-door policy and blame free safety culture in the reporting of hazards and useful work practices. The statutory requirement of all operatives to look after their own safety and not engage in activities which will put others at risk /cause them harm will be underlined.

Key personnel

4.6. The main points of contact for the project

Organisation	**Contact Details**			
	Name	**Position**	**Email**	**Phone Number**
Client (San Pedro Properties)	Andrew Mear	Principal Contractor / Project Director	andrew@sanpedro.uk	07966 421531
Space Architecture	Mick Dunn	Architect / Principal Designer	md@spacearchitecture.net	07795 146905

5. Health and Safety

5.1. The contractor will designate the person(s) who will have overall responsibility for Health and Safety on site. A designated person will be on site at all times while operations are taking place and have the necessary authority to initiate changes to work practices and/or mitigation as appropriate.

5.2. The key site personnel and their roles are detailed below:

Contact name	Role
Andrew Mear	Project Director

Smoking policy

5.3. In accordance with current UK legislation, a 'no smoking' policy must be established. Any designated safe openair locations where smoking is allowed will be of a low fire risk design, away from any combustible or flammable materials and provided with metal ashtrays filled with sand. A designated smoking area has been provided within the site compound.

5.4. Smoking rules will be brought to the attention of all workers and visitors to the site. Appropriate signs will be displayed, particularly in high-risk or communal areas such as canteens and site access points.

5.5. Contractors will be advised of the health risk associated with smoking and material will be displayed which encourages giving up smoking.

Pest Control

5.6. As well as being a threat to health and wellbeing, rats, mice, and birds can have serious structural and financial impact on buildings such as damaging thermal insulation, electrical wiring, drainage systems and other structural components. The Principal Contractor will produce a method statement (where required) on how pest control will be controlled during the construction works. Currently no pests have been noted on the site during the demolition works.

Asbestos

5.7. All asbestos located within the buildings to be demolished has already been removed by a suitably licensed contractor and no further asbestos is expected to be present within the existing site buildings.

5.8. No asbestos has been identified during ground surveys. However, should asbestos be identified on site, an appropriate asbestos management plan should be developed and implemented which may include mitigation measures including. wearing appropriate PPE/RPE, damping down of soils/ materials during excavation and stockpiling, and covering open excavations and stockpiled soils with plastic sheeting) during demolition, groundworks, and construction in order to ensure that workers and the general public are not exposed to asbestos fibres.

5.9. Consideration should be given as to whether any such works with asbestos are notifiable and or licensable under the Control of Asbestos Regulations 2012.

Public Community

5.10. Liaison with local residents and other nearby uses that may be affected by works is essential. The local community will be informed of the nature of the works, proposed hours of work and their expected duration to maximise the potential for consolidation and to minimise impacts.

5.11. The Principal Contactor should ensure that a staffed telephone enquiry line is maintained at all times when site works are in progress to deal with enquiries and complaints from the local community. The telephone number shall be publicised widely in the local community affected by the works.

5.12. Should noise, vibration and dust complaints arise from the building works, these complaints must be recorded in a complaint's register and make available to the Local Authority, if requested. The complaint register shall provide information on day, time, details of complaint, details of monitoring carried out and any additional mitigation works.

5.13. All site staff are to be regularly briefed regarding the complaint's procedure.

6. General Construction management

Operating Hours

6.1. The following hours of work for the site will be:

- Monday to Friday – 08:00 to 18:00;
- Saturday and Sunday – no work;
- No work between 21:00 to 03:00 on Friday and Saturday nights;
- Bank holidays – no work;
- No deliveries will take place other than between working hours;
- Works outside these hours will require agreement with the LPA.

6.2. The following enabling activities shall be permitted to take place within the period before and after normal working hours as outlined above:

- Arrival and departure of workforce on site; Deliveries and unloading;
- Checks and examinations of plant and machinery (including test running) and the carrying out of essential repairs / maintenance to plant and machinery;
- Site inspections and safety checks; and Site clean –up.

6.3. The times incorporated in the CEMP are specific to the site and related to the type of work being carried out. There are some occasions where the times have to be shorter and with break out schedules. Any noisy operations outside the standard hours cannot be undertaken without prior written approval of the Local Authority. The permitted times of working may be reduced in the case of noisy schedules. The principal contractor will be held responsible for ensuring these instructions are implied on the construction scheme.

Site Welfare and Site Offices

6.4. The site welfare will be in sufficient qualities to satisfy the compliment of site staff, in line with CDM regulations 2015, and include the following

- Access to adequate toilet and washing facilities;
- A place for preparing and consuming refreshments; and
- Somewhere for storing and drying clothing and personal protective equipment.

Construction Plant and Equipment

6.5. There is no plant to be used on site, only hand tools. An indicative list of the largest equipment to be used on site at all stages of the development includes:

- Chop saw;
- Table saw.

6.6. The development only involves the internal conversion of the existing building. As outlined in the list of plant and machinery above any of the required equipment can be suitably stored, locked, and secured within the building.

6.7. Banksmen will aid HGVs in entering and exiting the site, and open and close the gates. Gates will always remain closed other than during deliveries, after which the gates will closed and secured.

6.8. Only authorised personnel will be permitted on site. All visitors will be required to enter through the main entrance gate to the site and report to the construction manager / site manager. All visitors will be required to sign in and out to ensure that site management are aware of the number of people on-site in the event of an emergency.

6.9. Visitors will be required to undergo induction training, wear the necessary PPE i.e., safety helmet, hi-visibility attire, safety footwear and will be accompanied by a representative on-site at all times.

6.10. All mobile plant/equipment will be parked safely and locked within a designated area to prevent tampering, and keys to all plant / equipment will be kept in a secured location. All gas containers will be contained within a lockable store and all materials will be secured within lockable containers. All skips will be supplied with lockable covers and positioned a safe distance from the existing buildings and perimeter fencing to ensure fire safety.

7. Construction Transport

7.1. This section outlines the strategy to be put in place to control the movement of materials to and from an active site. The purpose of this section is to address the impact of construction traffic to the surrounding residential area.

7.2. There will be minimal workers on site at any one time, and it is likely there will be sufficient parking on site to accommodate site workers. Nevertheless, construction workforce will be encouraged to use sustainable modes of travel, such as walking, cycling and public transport, to reduce the impact of workforce travel on local residents and businesses.

Site Access

7.3. Site access is via Highfields Road at the northern boundary of the site. There are two access points, one leading to the car parking area at the front of Highfields. There is a second small access area to the rear of the Highfields Centre.

7.4. Heavy Goods Vehicles (HGV) movement's will be restricted as far as reasonably possible so as to avoid peak traffic flow periods (i.e., From 08.00-09.00 and 17.00-18.00) and will be by appointment only with all non preorganised deliveries turned away from site

7.5. All construction traffic entering and leaving the site will be closely controlled and during delivery times, traffic marshals will be positioned at the egress / ingress point to control and record entry and exit movements. On exiting the site and to avoid clashing with other traffic, all vehicles will be marshalled out of the site.

7.6. All employees and contractors supply chain members will be advised during the induction of the need to adhere to local speed limits and use the dedicated route to and from site. The route will be signed appropriately to avoid impacting on other residential areas. All new signage will be provided in accordance with the Traffic Signs Regulation and General Directions (TSRGD 2002).

7.7. For extraordinary loads, it is recommended that a route is planned in advance, for example, using Freight Journey Planner (http://www.freightjourneyplanner.co.uk/), using actual vehicle dimensions.

7.8. The access route will require caution regarding potential congested traffic conditions, especially between 06:30 – 9:00 and 15:30 – 17:30.

7.9. Make sure that all drivers and pedestrians know and understand the routes and traffic rules on site. Use standard road signs where appropriate. Provide induction training for drivers, workers and visitors and send instructions out to visitors before their visit.

Signage

7.10. The contractor will implement a clear and concise signage strategy throughout the site to identify vehicle routes and assist in internal traffic control. Signage will also identify the designated site office and parking areas for all personnel, site visitors and service vehicles. All signage on and off site will be inspected by the site manager or health and safety manager, on a weekly basis.

Loading and Unloading of Plant Materials

7.11. Deliveries must only take place within the site working hours, unless otherwise agreed prior to commencement.

7.12. Most materials will be on a just in time basis and loaded from the delivery vehicle onto the area it is required using a telehandler or other means of lifting such as self-off load or forklift. A small amount of materials may be stored and a designated storage area located in the link corridor has been set aside for this purpose.

7.13. A telehandler will be utilised for the unloading of delivery vehicles.

7.14. If site personnel are directing vehicle movement, they must be sufficiently trained as a banksman/signaller. The need for vehicles to reverse out of site onto public highways will be avoided where possible as reversing is a major cause of fatal accidents.

Reducing Vehicle Movements

7.15. The Building Research Establishment (BRE) suggest a number of considerations which are designed to reduce the number of deliveries which are required on site. These are detailed below:

- Start considering transport during design and project planning;
- Where possible, do not order surplus materials, equipment, or machinery;
- Schedule works to minimise total project time and thus reduce total number of travel days; and

- As far as is reasonable, do not hire and off-hire plant more than once per machine, thus reducing number of deliveries;
- Partnering and supply chain integration - formal or informal arrangements – can lead to multiple deliveries being condensed into one;
- For materials, use local suppliers, share deliveries, and arrange with the supplier to send vehicles back full with off-cuts or other waste;
- Site waste will be disposed of as locally as possible;
- Reducing waste reduces transport - for example packaging can be reduced through partnering between the contractor and supplier; and
- Offsite construction - reduced waste, reduced workforce, and reduced transport – can reduce numbers of movements.

8. Environmental Control measures

Waste Management

8.1. Waste produced on site will be subject to the duty of care under the Environmental Protection Act (1990). It is the joint responsibility between the principal contractor and the applicant to ensure that waste produced on-site is disposed of in accordance with relevant legislation. The transportation of waste to and from the site will also comply with the duty of care requirements.

8.2. Waste will be separated into labelled and segregated skips. Including but not limited to metal, plasterboard, wood, and general waste. The skips will be provided and emptied by licenced waste carriers in accordance with legislation. Any hazardous materials will be removed from site by specialist carriers.

8.3. Waste arisings will be stockpiled in a designated area and disposed of on a regular basis as determined by the quantities of waste arisings produced. Minimal off-site disposal is expected as all materials and soils excavated are proposed to be reused on site during construction.

8.4. Waste transfer notes will be obtained for all waste removed from site and transfer notes retained for a minimum of 2 years.

8.5. Skips will be located in a designated area and will be covered.

8.6. Waste materials will be disposed of by the contractor/s to appropriate recycling facilities or appropriately licensed landfills.

8.7. The site manager will audit waste carriers and disposal facility and maintain documentary evidence that these requirements are being met, including a register of waste carriers, disposal sites (including transfer stations) and relevant licensing details for each waste stream. Waste contractors who remove waste should be registered with the environment agency.

8.8. Materials used during the construction works such as oil, chemicals, cement, cleaning materials and paint have the potential to cause serious pollution. Therefore, the environment agency's pollution prevent guidance and other relevant guidance will be followed during the handling, storage, and use of such materials.

8.9. Procedures will be set in place to respond to any emergency incidents which may occur on the site.

8.10. Site works will be required to o investigate opportunities to minimise and reduce waste generation in line with WRAP's Halving Waste to Landfill initiative by:

- Agreeing with material suppliers to reduce the amount of packaging or to participate in a packaging take-back scheme;
- Implementing a 'just in time' material delivery system to avoid materials being stockpiled, which increases the risk of their damage and disposal of waste;
- Prioritising preassembled and prefabricated construction materials, wherever practicable, to minimise onsite generation of waste and packaging and reduce the number of delivery and collection vehicles to and from the site;
- Paying attention to material quantity requirements to avoid over ordering and generation of waste materials;
- Segregating waste at source where practical;
- Colour coding and signposting skips to reduce risk of cross contamination. Any skips required will also be covered to prevent dust and debris blowing around the site, these will be cleared on a regular basis; and
- Not burning waste or unwanted materials on site.

Air Quality, Dust, Odour and Dirt

8.11. During the conversion, there may be various site clearance works and activities undertaken. There may be elements of the conversion which have the potential to generate particle emissions arising from dust. The main sources of particle emissions during construction activities include:

- Clearance and earthworks;
- Exhaust pollutant emissions from construction traffic on the local highways network;
- Exhaust emissions from non-road mobile machinery (NRMM);
- Materials handling, storage, spillage, disposal, site preparation, excavation;
- Internal and external finishing and refurbishment.

8.12. An air quality assessment has been provided with the original application by BWB Consulting. An assessment of the potential impacts arising from the construction of the proposed development was undertaken in accordance with IAQM Guidance.

8.13. The report provides a screening of the potential impacts from the construction phase of the development. The report outlines various mitigation measures relevant to the on-site works proposed.

8.14. The highest risk category identified was 'Medium Risk' and the recommended mitigation taken from the IAQM guidance is outlined in **Appendix B**.

8.15. All works must comply with BS 5228: Noise and vibration control and the construction and open sites Part 1: Noise and Part 2: Vibration. A Noise Assessment has been undertaken for this site and no specific noise mitigation measures were proposed during the construction phase, however, the following measures will be adopted to reduce noise and vibration during the works.

- The permitted hours of work when noise can be audible at the construction site boundary shall be confined to the opening times identified above. Any noisy operations outside these hours cannot be undertaken.
- Noise must be kept to a minimum by methods of work that conform with The Control of Noise at Work Regulations 2005.
- All plant and vehicles associated with the construction phase will be fitted with appropriate silencers etc.
- Hearings protection should be available at all times and worn when identified in the relevant risk assessments. Noise should be kept to a minimum where reasonably practicable so not to disturb neighbouring properties or wildlife.
- Noisy plant or equipment will be situated as far as possible from noise sensitive buildings and orientated in such a way that noise is directed away from sensitive areas wherever possible.
- Application of the principle of best practicable means as defined in Section 72 of the Control of Pollution Act 1974, by carrying out all work in such as manner as to reduce any disturbance from noise to a minimum.

- Siting of delivery compounds away from receptors where practicable and use of low noise techniques.
- Barriers (e.g., site huts, acoustic sheds, or partitions) will be used to reduce the levels of noise reaching noise sensitive receptors. I.e., the residential receptors to the east of site during phase 4 of construction.
- Vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order, and operated in such a manner as to minimise noise emissions. The contractor shall ensure that all plant complies with the relevant statutory requirements.
- Machines in intermittent use should be shut down or throttled down to a minimum when not in use.
- Compressors should be fitted with properly lined and sealed acoustic covers which should be kept closed whenever in use. Pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Equipment powered by mains electricity shall be used in preference to equipment powered by internal combustion engine or locally generated electricity, where practicable.
- No part of the works nor any maintenance of plant shall be carried out in such a manner as to cause unnecessary noise except in the case of an emergency when the work is absolutely necessary for the saving of life or property or the safety of the works.
- Plant shall be maintained in good working order so that extraneous noise from mechanical vibration, creaking and squeaking is kept to a minimum.
- Vehicles employed for any activity associated with the construction works will, where reasonably practical, be fitted with effective exhaust silencers and shall be maintained in good working order and operated in a manner such that noise emissions are controlled and limited as far as reasonably practicable.
- Time slots are adopted for deliveries, to ensure that convoys of vehicles do not arrive simultaneously and to avoid unnecessary idling on site; the use of sufficient clear signage to ensure that construction vehicles use only designated routes.

- Strict control to prevent temporary parking on kerbside in the vicinity of noise sensitive receptors near the site.
- Shouting and raised voices shall be kept to a minimum.
- Vehicles will not wait or queue on the public highway with engines running. The site layout will be designed to minimise the need for reversing.
- Toolbox talks will instruct workers on noise and vibration issues; and
- A site inspection will be undertaken daily to identify and rectify and issues which may increase noise and/or vibration.

Piling

8.16. Piling is not required for this site, thus no specific requirements or mitigation solutions are required in regard to piling.

Contaminated Land and Ground Risk

8.17. A Phase 1 desk-top study has been undertaken for the site. A Phase 2 intrusive sit investigation has been commissioned by the applicant.

8.18. The site is located within a high risk area, as designated by the Coal Authority. When breaking ground care must be taken at all times and any smells or visible evidence of contamination noted to the site manager for advice. All site operatives should use good hygiene procedures as a matter of course during work below ground.

8.19. Pending the findings of the site investigation, all the workers on site will be made aware of any potential contamination issues on the site during the induction and will use best practice techniques during all construction activities.

8.20. A member of staff will be nominated to control and monitor the control of Substances Hazardous to Health (COSHH) system. Suppliers must send data sheets for every hazardous substance to the site. Supervisors and safety managers will brief staff members who will be using hazardous materials, on its safe use, disposal, and any emergency procedures. Written records of these briefings will be kept in the COSHH file held on the site.

8.21. A COSHH/fuel inventory will be maintained, and key contacts listed to be notified in the event of a significant pollution incident, which may subsequently lead to the contamination of controlled waters, Directly and indirectly purchased bulk fuel and COSHH items will be stored

in accordance with the relevant EA PPG/GPPs. Tanks and dispending pumps will be locked when not in use to prevent unauthorised access. Information regarding spill prevention and disposal of COSHH items will be provided as part of the standard site induction presentations and during regular toolbox talks and the works progress.

Ecology

8.22. The Preliminary Ecological Appraisal and Preliminary Roost Assessment previously submitted with the application identified a potential bat roost on the south facing gable of the rectangular building near the rear car park.

8.23. The building was assessed as offering a low/moderate level of bat roost potential. One bat roost was identified in association with the surveyed building and is a day roost used by a single common pipistrelle within a vertical joint in the masonry on a south facing gable. The roost is considered to be of low conservation value.

8.24. No changes are proposed to the south facing gable of this building and the proposed conversion is not envisaged to cause any disturbance to the day roost.

8.25. The report recommends that a Heras fencing is used to fence off land within a 2m radius of the roost at the outset of works. All site contractors should be notified of the roost location and advised not to enter the exclusion area without express permission. Contractors should be advised to site generators and other similar machinery away from this area. Middleton Bell Ecology can undertake an initial Toolbox Talk to the foreman and construction team at the onset of works, if required.

8.26. No indirect impacts upon foraging bats are anticipated as a result of the scheme.

8.27. With the exception of two large trees adjacent to the rear entrance, the site was considered unlikely to support nesting birds.

8.28. No notable plant species were recorded on site.

Lighting

8.29. Lighting on construction sites whether natural or artificial is essential to health and safety. Poor lighting can represent significant risks to staff members which can result in accident and injury, the quicker and easier it is to see a hazard the better the likelihood of avoiding it.

8.30. As outlined within section 35 of the CDM regulations (2015), the site must be provided with suitable and sufficient lighting, which must be, so far as is reasonably practicable, by natural

light. This related to both the construction site as well as the approach and traffic route to the site.

8.31. In determining any temporary construction lighting arrangements for the site, due consideration will be given by the principal contractor to residents and other sensitive receptors that may experience a nuisance by the light.

8.32. General control measures for the use of lighting on site are outlined below:

- As far as is practical, lighting must be directed away from residential and ecological sensitive areas; and
- Lighting should always be positioned to prevent glare.

Highway Condition Survey

8.33. Prior to works commencing a photographic condition survey should be taken of the surrounding roads and footpaths as a record and issued to relevant parties; a commitment should be made to make good any damages caused.

8.34. The road condition survey has been prepared to assess the current state of the roads surrounding the development site. The purpose of this survey is to document the existing condition of the roads to ensure that any potential impact from the development can be monitored effectively.

8.35. It is noted that no major construction traffic is required as part of the proposed development as the development largely consists of internal conversion. However, some level of construction vehicles will be required for the minimal construction required for the demolition of the link building, although these works are yet to commence.

8.36. A visual inspection of the roads surrounding the site was conducted on 21 February 2025, and focused on the road surface conditions, drainage, kerbing and any signs of existing damage or deterioration. Photographic evidence has been recorded where necessary to support the findings and these can be found in Appendix E.

8.37. The site is accessed via Highfields Road, which connects to the A629 New North Road. New North Road comprises of a tarmac road surface. Highfields Road to the north of the site predominantly comprises of a cobbled street with two access points to the site at the northern boundary. Highfields Road to the northeast of the site comprises of tarmac road surface with another access to the east of the site.

- Highfields Road to the north (Photo 1, 2, and 3):

  Surface Condition: The cobbled streets are intact, with no visible signs of major displacement, potholes, or excessive wear.

  Drainage: No significant pooling of water or blocked drains were observed, indicating that the drainage system is functioning effectively.

  Kerbs and Footways: Kerbs are generally in good condition with no signs of major damage. Footways are well-maintained and accessible.

  Road Markings: There are no road markings beyond the double yellow lines at the junction with New North Road. These markings are clear and in fair condition.

- Highfields Road to the Northeast (Photo 4, 5 and 6):

  Surface Condition: The tarmac streets are generally intact, but there are some visible signs of displacement, but these would not be considered as major. There are some small potholes evident on the corner of Belmont Street, but along Highfields Road these have largely been resurfaced in recent years. The entrance to the site shows no signs of excessive wear.

  Drainage: No significant pooling of water or blocked drains were observed, indicating that the drainage system is functioning effectively.

  Kerbs and Footways: Kerbs are generally in good condition with no signs of major damage. Footways are well-maintained and accessible.

  Road Markings: Double yellow lines clear and visible and other road markings at the junction of Belmont Street are in fair condition.

8.38. Based on this survey, the roads surrounding the development site are currently in good condition. Given that no major construction traffic is required for the proposed development, no significant impact on the road condition is anticipated. Although, it is recommended that a post development inspection is carried out to confirm that road conditions remain unchanged and any minor wear and tear during the development period is addressed promptly to maintain the quality of the roads.

Preventative measures for Highway Debris

8.39. The quantity of construction traffic is expected to be extremely minimal, however, a wheel cleaning facility will be implemented at the site boundary either in the form of a wheel spiller or wash facility, to prevent site debris from littering the roads/streets leading up to the site.

8.40. Additionally, if any debris or hazards end up on public highways it should be cleared by a dedicated Site Operative and the use of road sweepers deployed as appropriate.

8.41. Good housekeeping practice, if properly applied, will greatly reduce waste or debris littering the public road. This in turn will reduce the need for cleaning of public areas. However, if any cleaning is required, this will be undertaken within the site boundary and the roads surrounding the site inspected regularly for debris.

Site and Contractor Commitments

8.42. In order to minimise any impacts from construction activities on local residents and businesses, the developer commits to adopt and implement ICE Demolition Protocol and the Considerate Contractors Scheme. In addition, the site manager will endeavour to ensure that affected parties are fully informed in advance of known activities which may cause inconvenience. The following general measures should be implemented:

- Communication and liaison with relevant parties will be established prior to works commencing and will be ongoing throughout the project to ensure good relations are maintained;
- Contact details will be displayed on the site hoarding;
- All incidents or complaints received from the general public or local businesses must be reported to the site manager immediately;
- Details of incidents will be logged together with the measures implemented to prevent any reoccurrence or reason given;
- This log will always be available for inspection by the client, company & health and safety advisers and considerate constructor monitors;
- We accept that 'noise' can be very disturbing to our neighbours, and the following steps will be taken to ensure noise issues are managed effectively;

  A) All operations on site will be confined to the working hours detailed within the planning consent;

B) Whenever possible particularly noisy operations will be undertaken at the times of day less likely to disturb our neighbours if noise cannot be controlled at source;

C) If necessary, we will work closely with the Local Authority to resolve any noise/ dust related disputes, in the unlikely event that our standard measures are not effective;

- All efforts will be made to mitigate noise from plant or machinery and dust from site operations.

Temporary Drainage

8.43. The site will be developed in a number of small phases to suit the client's development plans and commercial constraints. the proposed development includes the partial demolition of the link building, and the excavation of an outdoor amenity space for the new dwelling within the former toilet block. The respective works are situated to the north and the southeast of the site boundary.

8.44. Condition 3 requires the inclusion of temporary drainage measures to be proposed and approved to ensure that surface water run-off is appropriately managed on site as a result of the required works.

8.45. The Main Contractor will be responsible for management issues arising from the project and the Implementation and monitoring of surface water runoff and safe disposal measures.

8.46. During the groundworks phase of the development a strategy shall be put in place to practicably avoid the pollution of groundwater and surface waters in accordance with the Environment Agency's Pollution Prevention Guidelines as listed below.

- PG1 General Guide to the Preventions of Water Pollution - Environment Agency;
- PPG5 Works or Maintenance in or Near Water - Environment Agency;
- PPG6 Working at Construction and Demolition Sites - Environment Agency;
- PPG21 Incident Response Planning — Environment Agency; and
- C532 Control of Pollution from Construction Sites — CIRIA.

8.47. Throughout construction works regular inspections of all discharge points and associated pipe work, drainage systems, and collection ditches, will be undertaken to check that they are in good order.

8.48. The proposed outdoor amenity space for the new dwelling is located to the north of the site, in proximity to Highfields Road. As such, the works will need to be ensure any silts or contaminants do not enter the highway network.

8.49. Appropriate provisions will be put in place to minimise the discharge of uncontrolled surface water run-off containing suspended sediments and silt affecting groundwater. These provisions will include appropriately contained wheel wash facilities to isolate sediment-rich run-off, plant and wheel washing facilities etc.

8.50. Provisions will be put in place so that all hazardous or potentially hazardous substances used, including fuel and oil, are stored in secure, bunded compounds to prevent material causing pollution. Fuels, oils and other bulk liquids shall be stored inside appropriately bunded compounds in accordance with the Environment Agency's Pollution Prevention Guidelines. Waste waters or cleaning liquids produced from general works will not be allowed to accumulate on the surface of the site or be disposed of into stormwater system and will be appropriately contained/stored and tankered-off site to a suitably licensed facility.

8.51. An Emergency Response and Pollution Plan will be prepared which will detail how any spillages and leakages will be managed during works in order to minimize adverse impacts on the groundwater. Any required discharges will be undertaken under appropriate discharge consents obtained from the regulatory bodies i.e. Environment Agency and the local Water Authority.

8.52. Stockpiling of material on site is to be minimised to ensure that the natural surface water flows on site are not compromised and that overland flood flow routes are not obstructed. In addition, placement of any stockpiled material is to be such that surface water is not able to carry particulates and deposit them in other areas of the site.

8.53. The risk of spillage of diesel and other contamination risk during construction activities are to be assessed and measures implemented to ensure they do not cause a risk to groundwaters.

8.54. The measures in place above will ensure that any changes or increases to surface water flows as a result of the proposed works required are appropriately managed during the construction phase.

9. Tree Protection Plan

9.1. No significant ground works are proposed close to the trees of amenity value to the east of Building B. The tree to the north of Building A is also to be retained within its existing bed. These trees will nonetheless need to be protected during conversion works.

9.2. The principal protection for the retained trees is provided by Tree Protection Fencing (TPF) positioned to form a Construction Exclusion Zone (CEZ) around retained trees. No access should be allowed to the other than for operations specified in the approved documents or those agreed with the LPA later.

9.3. In this case, the trees are located to the east of Building B, and one tree is located to the northeast of Building A.

9.4. The CEZ must be in place prior to the commencement of construction work on site. The TPF must not be moved or relocated without approval from the Project Arboriculturist and, where necessary, approval from the Local Planning Authority.

9.5. The TPF specification should be fit for the purpose of excluding construction activity and appropriate to the degree and proximity of work taking place around the retained trees.

9.6. The most common specification as illustrated in BS5836:2012 Figure 3b (**Appendix D**) comprises welded mesh panels (Heras Fencing) on rubber or concrete feet, the panels should be joined together using a minimum of two anti-tamper couplers, installed so that they can only be removed from within the fence. The distance between fence couplers should be at least 1m and should be uniform throughout the fence. The panels should be supported on the inner side by stabilizer struts, which should normally be attached to a base plate secured with ground pins. Where the fencing is to be erected on retained hard surfacing or it is otherwise unfeasible to use ground pins, e.g. due to the presence of underground services, the stabilizer struts should be mounted on a block tray.

9.7. Weatherproof signage will be attached to the fencing with words such as 'Construction Exclusion Zone – No Access.

9.8. At the end of the project the fence will be removed only after confirmation by the Project Arboriculturist and the Council that this is appropriate.

9.9. At the end of the project the TPF will be removed only after confirmation by the PA and the Council that this is appropriate.

9.10. The key measures for the protection of Arboricultural resources will be adopted during construction works include the following:

- Construction Exclusion Zone, to be secured by means of temporary protective fencing with weatherproof signage, will be used for trees to be retained as part of the development where no unauthorised access to construction operations are permitted;
- Should any ecological issues be identified during the course of development, consultation with the relevant statutory and advisory bodies such as Natural England (NE) and the EA will be undertaken;
- Areas within Root Protection Areas, will be prepared prior to development works with ground protection, fit for purpose;
- The installation of Tree Protection barriers, to be installed prior to any construction works including inspection by the designated arboriculturist;
- No materials that are likely to have an adverse effect on tree health to be stored or discharged within 10m of a trunk of a tree that is to be retained;
- No storage of materials within the protective fencing;
- No breaching or moving the protective fencing without prior approval;
- Care required in the movement around trees to reduce physical damage of trees;
- Service routes that run through the Root Protection Areas are to be hand dug, kept narrow and should not extend within 1m from the base of a trunk;
- Exposed routes larger than 25mm should be retained with bark intact and when exposed wrapped in hessian sacking.

10. Conclusions

10.1. The report has been prepared to support the proposed conversion of the Highfields Centre New North Road, Huddersfield to 33 apartments. The report has aimed to outline the process and to demonstrate a clear and well thought out strategy to deliver the conversion. The CEMP is based on the whole scheme, so changes will only need to occur if large changes to the strategy happen.

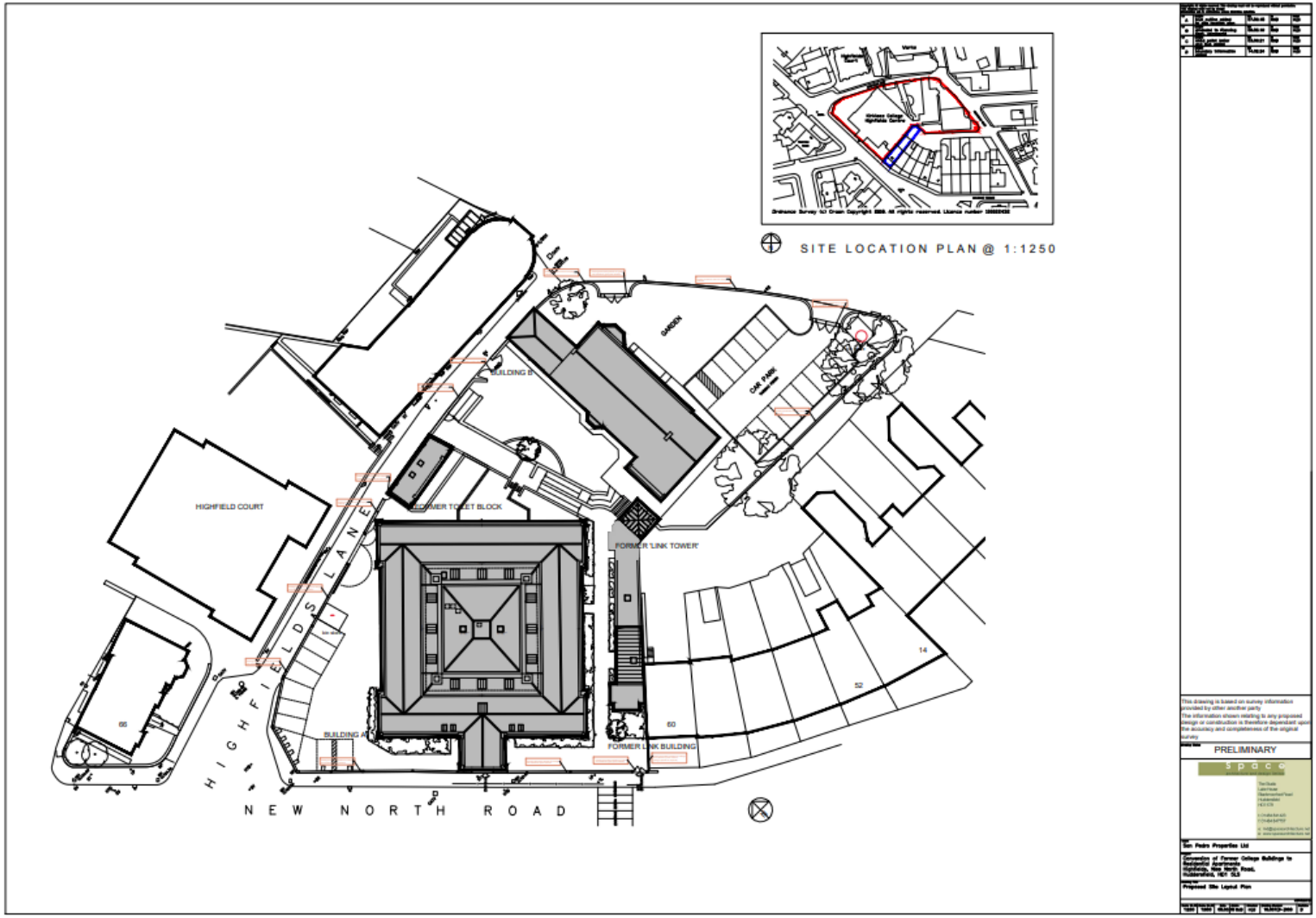
10.2. The CEMP will need to be regularly monitored as the project progresses and updated with any changes or as further information is made available. This includes changes during the development, and if there are any significant changes to the scope or programme.

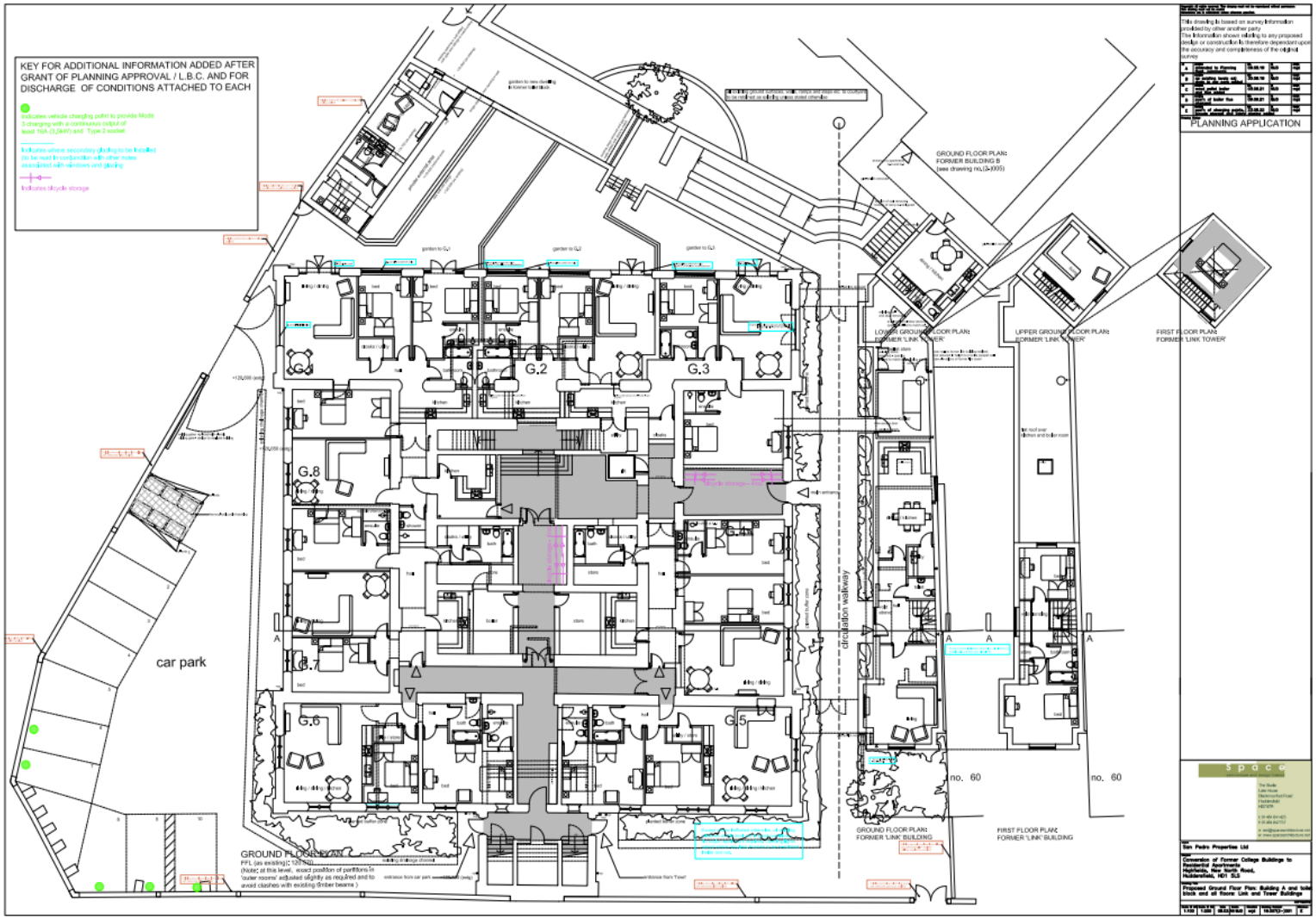
10.3. The measures detailed within this CEMP have been specifically designed to meet with planning and legislative requirements.

10.4. Should there be any queries regarding the application submission then please contact mp@broadgrove.co.uk.

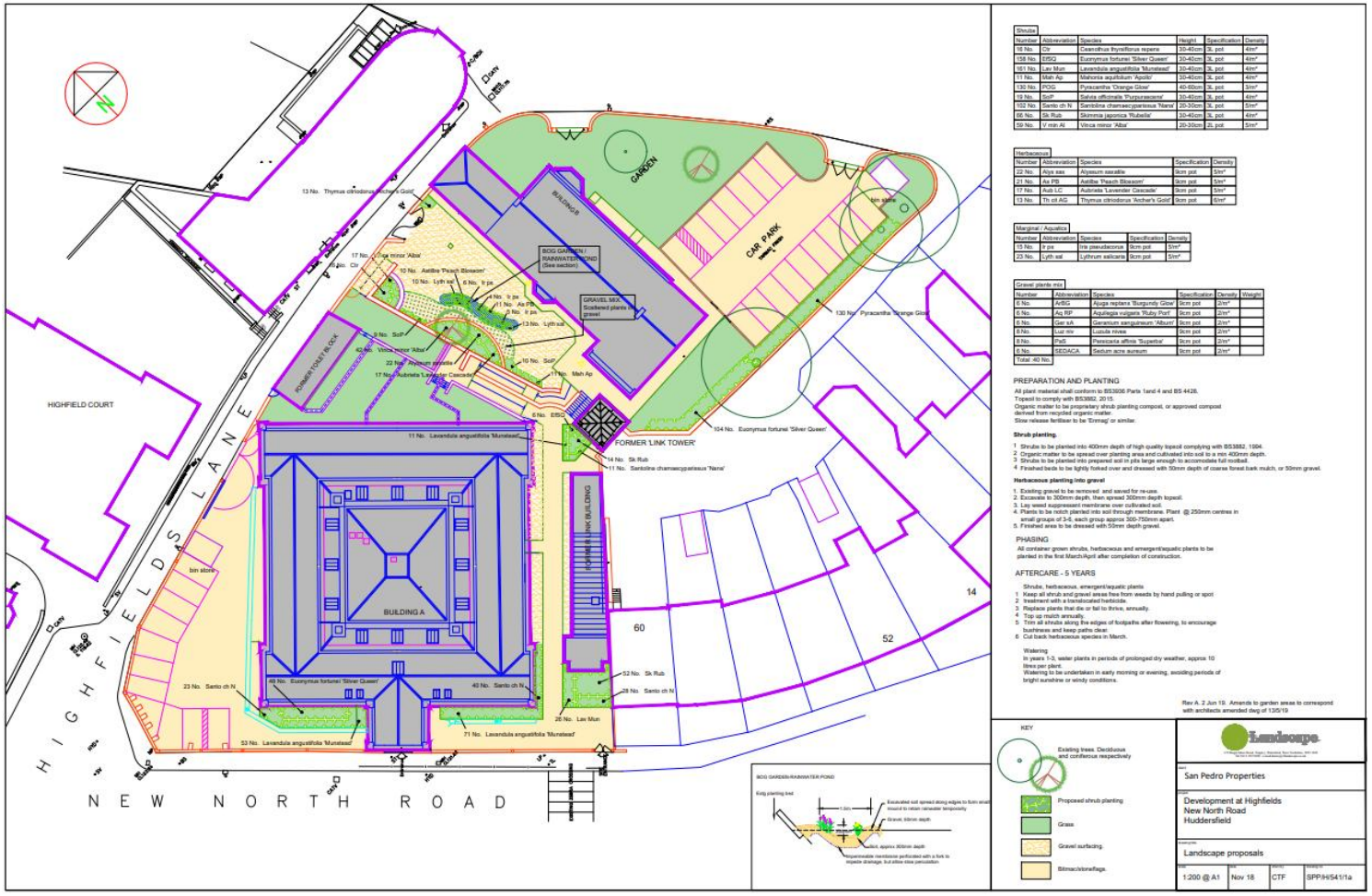
Appendices

Appendix A – Approved Site Layout and Ground Floor Plan




KEY FOR ADDITIONAL INFORMATION ADDED AFTER GRANT OF PLANNING APPROVAL / L.B.C. AND FOR DISCHARGE OF CONDITIONS ATTACHED TO EACH
PLANNING APPLICATION
car park
circulation walkway
G.1
G.2
G.3
G.4
G.5
G.6
G.7
G.8
no. 60
no. 60
GROUND FLOOR PLAN: FORMER BUILDING B
GROUND FLOOR PLAN: FORMER 'LINK' BUILDING
FIRST FLOOR PLAN: FORMER 'LINK' BUILDING
GROUND FLOOR PLAN
FIRST FLOOR PLAN: FORMER 'LINK' TOWER
San Pedro Properties Ltd

Appendix B – Approved Landscape Plan



Appendix C – IAQM guidance for a 'Medium Risk' Site

Table 4.4: Mitigation Measures for a Medium Risk Site

Category	Mitigation Measures	
	Highly Recommended	Desirable
Communication	Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	None
	Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environmental manager/engineer or the site manager.	
	Display the head or regional office contact information.	
	Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.	
Site Management	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner and record the measures taken.	None
	Make the complaints log available to the local authority when asked.	
	Record any exceptional incidents that cause and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the log book.	
Monitoring	Carry out regular site inspections to monitor compliance with the DMP, record inspections results, and make an inspection log available to the local authority when asked.	Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of the site boundary, with cleaning to be provided as necessary.
	Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	
Preparing and maintaining the site	Plan the site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	None
	Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.	
	Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extended period.	
	Avoid site runoff of water or mud.	
	Keep site fencing, barriers and scaffolding clean using wet methods.	
	Remove materials that have a potential to produce dust from site as soon as possible. Unless being re-used on site. If they are being re-used on-site cover as described below.	
	Cover, seed or fence stockpiles to prevent wind whipping.	

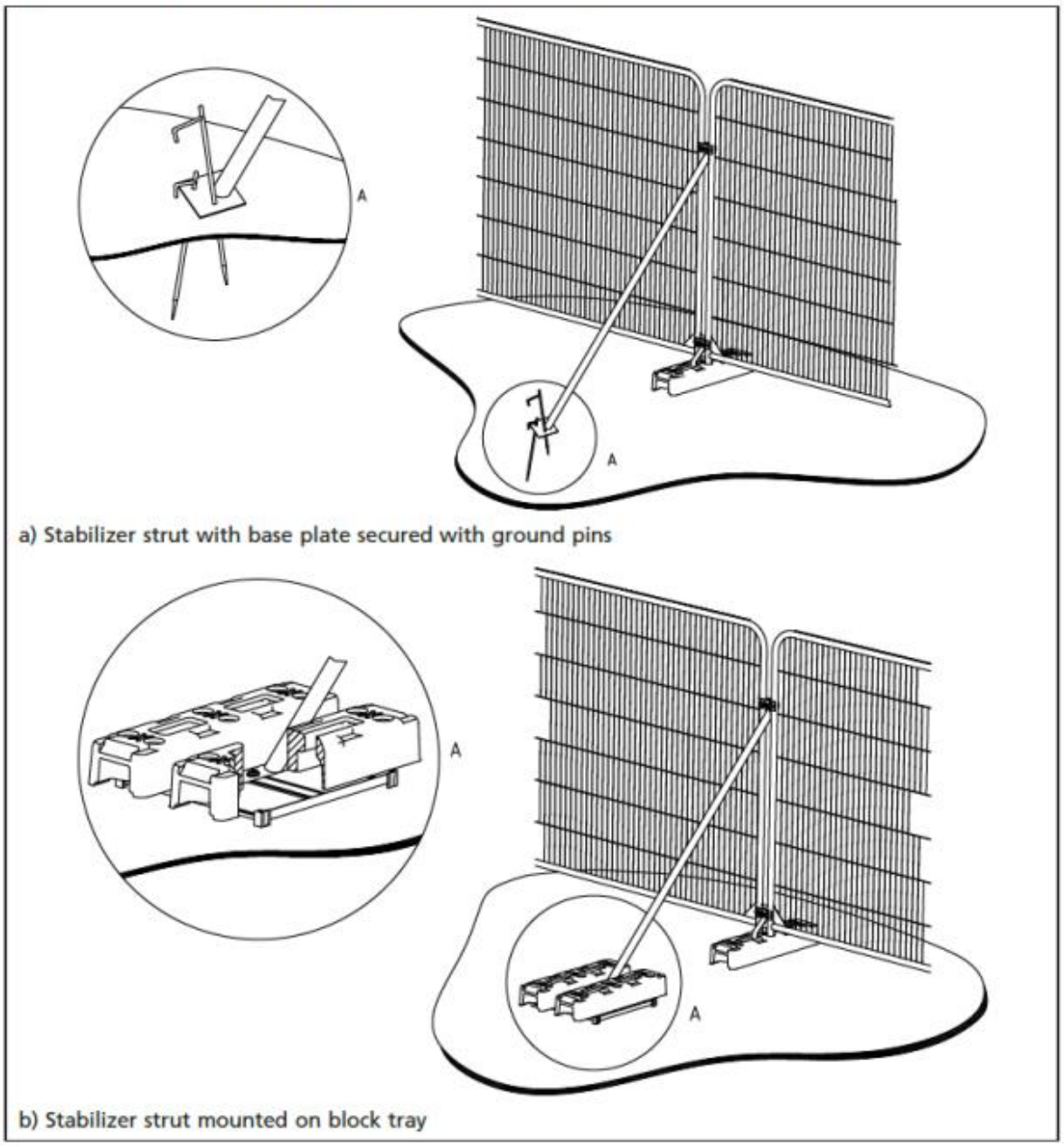
Category	Mitigation Measures	
	Highly Recommended	Desirable
Operating vehicle/ machinery and sustainable travel	Ensure all vehicles switch off engines when stationary – no idling vehicles.	Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable control measures provided, subject to the approval of the nominated undertaker with the agreement of the local authority, where appropriate).
	Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.	
	Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
Operations	Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.	None
	Ensure an adequate water supply on site for effective dust/particulate matter suppression/mitigation, using non-portable water where possible and appropriate.	
	Use enclose chutes and conveyors and covered skips.	
	Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	
	Ensure equipment is readily available on site to clean and dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	
Waste Management	Avoid bonfires and burning of waste materials.	None

Table 4.5: Mitigation Measures Specific to Demolition, Earthworks, Construction and Trackout

Category	Mitigation Measures	
	Highly Recommended	Desirable
Demolition (Medium Risk Site)	Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.	Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
	Avoid explosive blasting, using appropriate manual or mechanical alternatives.	
	Bag and remove any biological debris or damp down such material before demolition.	
Earthworks (Low Risk Site)	None	None
Construction (Low Risk Site)	None	Avoid scabbling (roughening of concrete surfaces) if possible.
		Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
Trackout (Negligible)	None	None

Appendix D – Tree Protection Fencing (BS5836:2012 Figure 3b)

Figure 3 Examples of above-ground stabilizing systems



a) Stabilizer strut with base plate secured with ground pins

b) Stabilizer strut mounted on block tray

Appendix E – Road Condition Photos

Photo 1 – New North Road into Highfields Road

Photo 2 – Highfields Road site access

Photo 3 – Highfields Road north access 2

Photo 4 – Highfields Road northeast access

Photo 5 – Highfields Road northeast of site

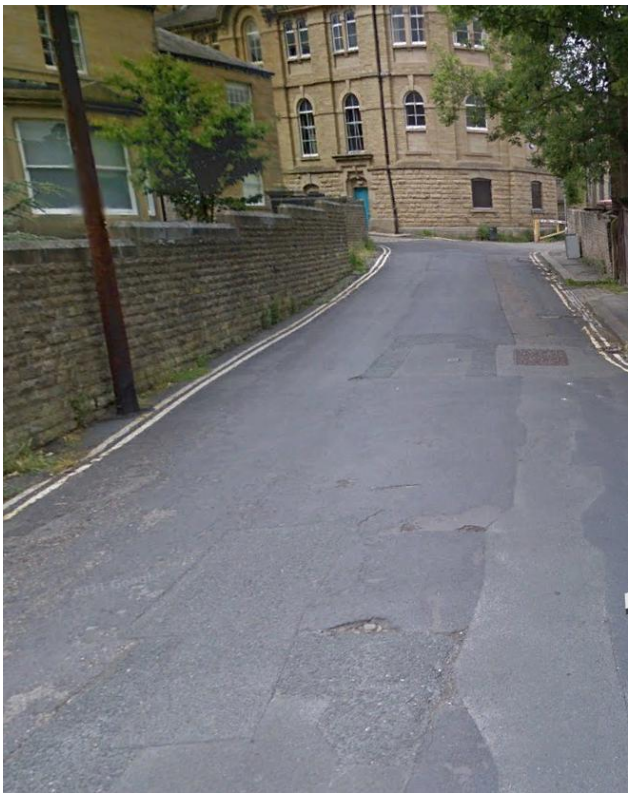


Photo 6 – Highfields Road northeast access