

# **A629 Halifax Road Huddersfield (TF5) Area B, C & D Construction Environmental Management Plan**

**July 2025**

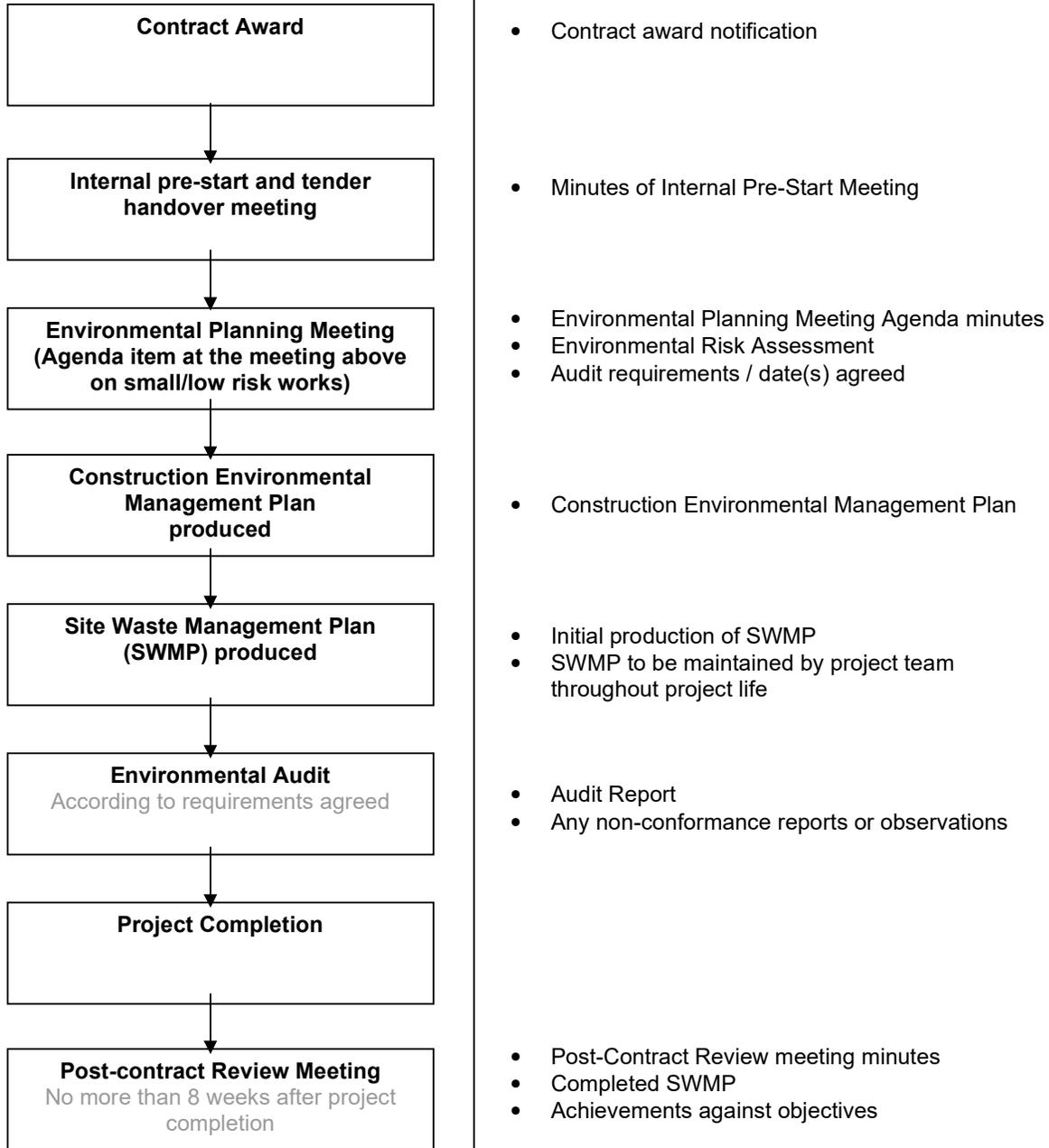






**PROJECT ENVIRONMENTAL MANAGEMENT**

**Key outputs/ actions at each stage**



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**Appendix I** - Waste Carriers Licences (copies recorded in Site SHEQ Files)

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This Construction Environmental Management Plan (CEMP) is complementary to CR Reynolds Limited's ISO14001 accredited Environmental Policy and associated IMS documents. It has been prepared to include any environmental considerations brought to CR Reynolds Limited's attention by the Client or their representatives by the date shown on the front cover.

Project and Site Management are responsible for reviewing the proposed work processes of CR Reynolds Limited and subcontractors in addition to monitoring their activities on site. Part of the review and monitoring includes consideration of the environmental implications of their activities.

Where necessary, expert advice may be sought from CR Reynolds Limited's. Head Office support or our appointed specialist external health, safety, and environmental consultants.

The environmental implications of CR Reynolds Limited's activities will be considered during design reviews, pre-commencement planning meetings, Risk Assessment and Method Statement (RAMS) reviews and on site as part of the site health, safety, and environment inspection and auditing regime.

Throughout this document reference will be made to CR Reynolds Limited's company procedures and guidance notes, particularly those concerned with waste minimisation, waste management and pollution control.

## CHAPTER 1 THE PROJECT & COMPANY POLICY

### 1.1 Project Details

<b>Client:</b>	Kirklees Council
<b>Principal Contractor:</b>	CR Reynolds Limited
<b>Programme:</b>	September 2025 – December 2026
<b>Any Key Dates:</b>	N/A
<b>Responsible Persons</b>	<ul style="list-style-type: none"> <li>• Client</li> <li>• Principal Designer</li> <li>• Designers</li> </ul> <p>CR Reynolds Limited –</p> <ul style="list-style-type: none"> <li>• Operations Director (Liam Carter)</li> <li>• Contracts Manager (Sam Knaggs)</li> <li>• Site Manager (Dan Hughes)</li> <li>• SHEQ &amp; IMS Coordinator (Chris Butts)</li> <li>• Public Liaison Officer (Vicki Thacker)</li> <li>• Works Supervisors (Craig Carter)</li> <li>• Site Operatives</li> </ul> <p>External HSE Advisor –</p> <ul style="list-style-type: none"> <li>• Building Safety Group (Paul Blakeman)</li> </ul>

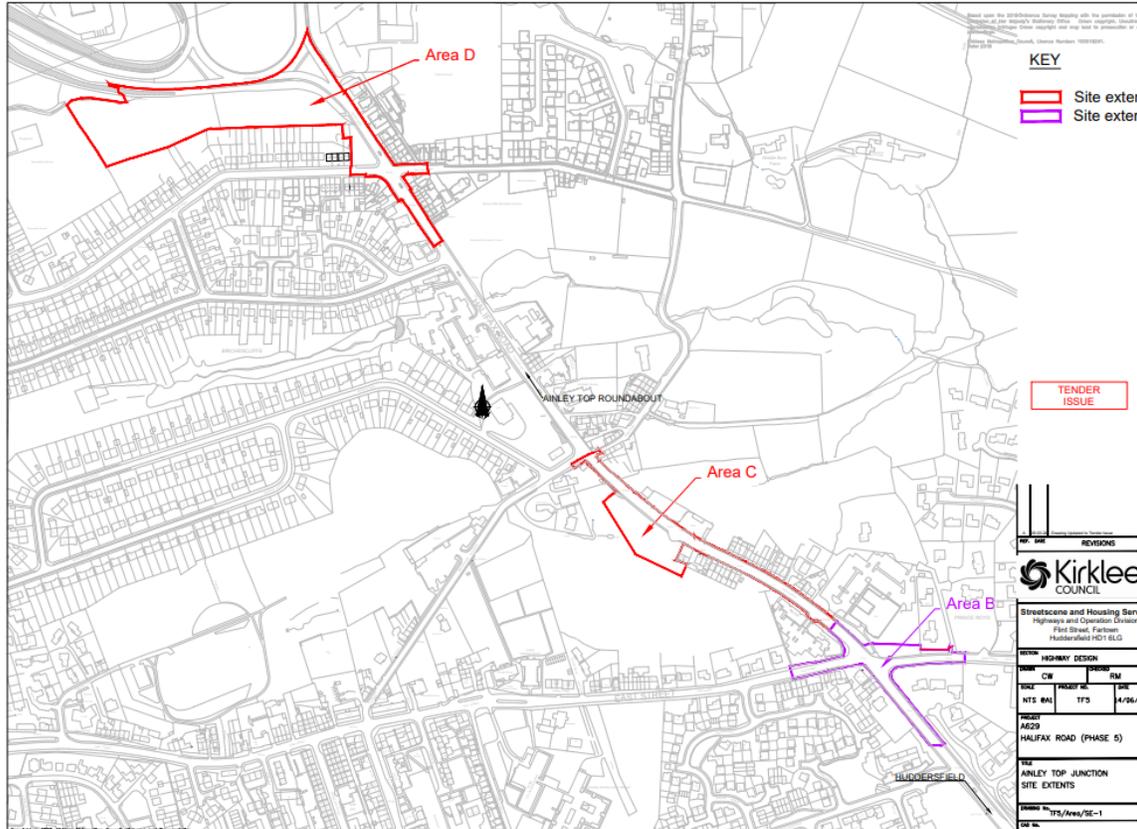
## 1.2 Site Location and Description of the Project

### Site Location:

**Area B** – Calvary Arms Junction with East Street and Birkby Road

**Area C** – Prince Royd Car Park/ Halifax Road

**Area D** – Ainley Top Junction / Halifax Road / Blackley New Road



### Drawing Indicating Work Areas

#### **Area B – Centrepnt**

Easting: 412245

Northing: 418514

#### **Area C – Centrepnt**

Easting: 412044

Northing: 418640

#### **Area D – Centrepnt**

Easting: 411633

Northing: 419144

## **Description of the Project:**

Split across three phases, works include:

- Reconstruction of the existing Prince Royd Car Park on the southern site of A629 Halifax Road.
- Footpath resurfacing and new layby construction.
- Construction of a new 8m wide carriageway through an existing field, including new cycle path and footway.
- Existing carriageway widening.
- Demolition of an existing and construction of a new retaining wall.

## **Area B**

The site has remained relatively unchanged since the earliest historical maps, the existing highway in the existing layout has been present since the 1850s. Residential gardens were present in the north of the site from the 1960s (it is assumed that this is The Church of the Jesus Christ of Latter-day Saints and 402 Birkby Road).

A Brick and tile works were present 200m north-west and 160m west of the site from the 1890s and 1930 – 60s, respectively.

A quarry was present in the 1960s 200m – 500m north-west of the site (these are later described as landfills in Section 6.4). Two additional landfill sites were present 60m to the west of the site (it is assumed these are part of the brick and tile works).

## **Area C**

A Brick and tile works were present between the 1880s and 1980s extending into and across the south of the site. An associated quarry was present 100m to the south extending across the site in the 1960s. Two licensed landfills operated at the site, the first between 1942 and 1979 which received inert, commercial and industrial waste, the second between 1985 and 1990 which received inert and commercial waste.

A shaft was present immediately south of the site in the early 1900s, and tanks were present on the site between 1930-1956, it is assumed these were associated with quarrying, and the shaft is not a coal mine shaft.

A pond was present on the site in the 1930s and 15m west of the site in the 1970s and early 1980s, where 'issues' are also denoted.

A garage has been present immediately opposite the north of the site since the 1960s, and is now a used car dealership.

## **Area D**

Halifax Road was shown on the earliest available map, however the current highway layout was established in the early 1970s when the Ainley Top roundabout was constructed. The majority of the site area has remained undeveloped open fields since the earliest map. A watercourse continues to exist in the west corner of the study site. The southeastern corner of the site was occupied by a residential property from 1930 until it was recently demolished. The historical maps show former collieries and infilled quarries in the surrounding area, although none immediately adjacent to the site.

Most notably in the surrounding area:

- Probable unrecorded shallow coal workings beneath the site and the 36 Yard Coal outcrops within the site area.
- An area of historical mining 150m northeast of the site.
- On-site risk of quarrying the Elland Flags.
- Risk of seat earth working in the locality.
- Infilled sandstone quarries 500m + to the northeast, east and south.
- Former landfill 153m south-east of the site, which received inert waste between 1981 and 1988

### 1.3 Company Environmental Policy

CR Reynolds Limited, in recognition of the increasing demand that products and services, are environmentally sustainable and calls for steps to prevent pollution in an endeavour to rebuild a healthy global environment, undertakes to:

Ensure continuous improvement of our management system by setting objectives and targets which will be monitored and reviewed throughout the year.

Comply with applicable legal requirements and with other requirements to which we subscribe such as ISO14001 requirements, and Network Rail Policies.

Ensure that its works are sympathetic to the environment, paying close attention to the storage, treatment, and disposal of any hazardous or potentially toxic material to avoid environmental harm. Waste is disposed of by means of a skip to a registered waste management disposal company.

Wherever practical, use materials and products originating from sources which can be shown to be sustainable, and which are re-usable or can be recycled.

Pay particular attention, to the emission of pollutants, reduction in noise, dirt and to taking the most stringent precautions to avoid health hazards and ensuring that environmental impacts are minimised during its activities.

Continue to develop an environmentally aware approach to the management of the Company, recognising also that sound management of energy and resources in land and materials cuts cost and create competitive advantages.

Continue to develop and practice in house environmentally caring policies covering its use of premises, sites, plant, and other assets. The Company will also continue to promote energy efficiency and sound environmentally sensitive practices.

Use traditional methods and continually seek innovative and proactive ways in which to recycle our waste. This policy will be reviewed at least every 12 months.



**Signed:**

**Date:** 31/05/2025

**Title:** Managing Director/ CEO

### 1.4 Environmental Objectives

This site will strive to:

- Comply with all relevant environmental legislation avoiding prosecutions for the contravention of environmental law and regulations.
- Maintain responsibility for ensuring the works are conducted in a way that minimises environmental impact and obstruction, siltation, or any other hindrance.
- Raise environmental awareness throughout the CR Reynolds Project Delivery Team, including suppliers and subcontractors, by means of Site Inductions, regular Environmental Toolbox Talks, briefings and through RAMS.

- Commit to achieve 'zero pollution incidents' (emergency spills, noise, nuisance, water contamination, waste storage/ management issues) whilst maintaining an operational work site.
- Implement the waste hierarchy: **eliminate** waste where we can; **reduce** the waste we create; **reuse** materials until we cannot use them again; **recycle** waste where reasonably practicable; and only **dispose** of waste if we are unable to recycle.
- Identify and recognise all statutory and non-statutory designates sites, listed buildings and protected flora, fauna and wildlife that may potentially be affected by CR Reynolds Limited's activities. CR Reynolds Limited. will instigate appropriate mitigation measures to ensure adequate protection of the surrounding environment and ensure that, through various actions, minimum disturbance is caused.
- Work transparently and collaboratively with the Client's project and design team(s) and appointed subcontractors/ suppliers to ensure continuity of environmental awareness and approach, throughout the Construction Phase.
- **Area B**
  - It is recommended that two approaches be undertaken to address the gas risk concern at the site:
    - 1. An updated conceptual site model is created based on the findings of the GIR to provide more robust source, pathway, receptor information to prove that any gas migration from changes to the regime is likely to be negligible to the residential properties of concern. Additional monitoring has been undertaken and although the proposed works could affect gas migration pathways, potential sources are to the west/northwest so the works will not impact any migration pathways. Soft standing is also retained near to the garden areas. Refer to Risk Assessment on Pg15 of this document.
    - 2. Alongside the above and in the event planning does not agree with the above approach, locate WS002 and WS005 to undertake three additional visits as per the responses from planning, targeting low and falling pressure.
  - Following review and subsequent update of the conceptual site model, it is considered that there is negligible change to the gas risk to the adjacent properties at the site due to the nature of the proposals and the existing ground conditions, and that a monitoring based approach is not required to demonstrate this.
  - 6.2 Asbestos was previously recorded to be present in one sample (WS02) between 1.10 and 1.20m. Note that the quantity of Asbestos found was of a very small quantity. JNP Group does not consider this to be a significant risk given that the depth is greater than the proposed excavation depth (0.82m bgl). It is recommended that suitable PPE should be worn, and a watching brief is required during excavation. Should any unanticipated asbestos be encountered, this should be assessed and removed by a qualified sub-contractor.
  - 6.3 JNP Group do not consider there to be significant risk to human health or controlled waters from elevated soil concentrations at the site as none have been identified to date. There is a small risk to construction workers from unanticipated contamination which would be mitigated by suitable remedial measures should this be encountered.

#### **Area D**

Combine geological data and construction drawings to more thoroughly understand the interaction of the two.

JNP group reviewed the contaminated material around TP006 and have amended the works information associated with the retaining wall works to excavate the contaminated material and remove to tip.

Additional monitoring has been undertaken and although the proposed works could affect gas migration pathways, potential sources are to the west/northwest, therefore based upon specialist advice, the works are not anticipated to impact on any migration pathways.

JNP group have updated the conceptual site model based on the findings of the GIR, and the works information has been amended to suit these findings. C R Reynolds will work in strict accordance with the JNP recommendations.

It is not considered there to be significant risk to human health or controlled waters from elevated soil concentrations at the site as none have been identified to date. There is a small risk to construction workers from unanticipated contamination which would be mitigated by suitable remedial measures should this be encountered.

Following review and subsequent update of the conceptual site model, it is considered that there is a low risk to construction workers from depleted oxygen noted in BH03 and high flows in BH005(S), where care should be taken in below ground excavations. The risk post construction remains the same as pre-construction, there is a negligible change to the gas risk to the adjacent properties.

## CHAPTER 2 ENVIRONMENTAL CONSIDERATIONS

The following topics have been considered in drawing up the list of site-specific risk activities associated with the works.

### 2.1 Dust and Air Emissions

During the proposed construction works, there may be a risk of generating dust from site operations. Noxious air emissions on site can also be produced by diesel or petrol-powered engines of construction plant, vehicles, and auxiliary equipment such as excavators and generators.

**Sensitive Receptors:** The project involves works along existing, busy public carriageways, with several occupied premises within close vicinity to the works.

#### Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Dust/ fume generated from construction and breaking out activities	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Use of dust extraction, suppression, capture technologies. Ordering plant and equipment from reputable sources. Maintenance/ inspection regime for plant/ equipment, minimise cuts by ordering materials to correct size (where possible).
Debris	Falling from plant and HGVs	Local businesses/ residents/ wildlife/ habitat	Visual soiling, also consequent resuspension as airborne particulates	Reuse of site won material on site (wherever possible) to reduce load/ cart/ tip off site. Cover HGVs before leaving site. Roadsweeper visits as required. On-site water

				bowser and jetwash. Reduce tip heights.
Non-road going machinery exhaust emissions	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength (see 'Overview of Site Dust and Emission Controls to Disrupt Source-Pathway-Receptor Routes' below).
Handling dry aggregate material	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Minimise source strength by means of low drop heights, profiling and shielding of piles from wind whipping, positioning sources away from receptors. Also dampening down of certain stored materials or covering materials as appropriate.
Waste handling	Wind-blown, atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Visual soiling and airborne particulates	Use of enclosed skips (where available), shielding of piles from wind whipping, positioning sources away from receptors. Also dampening down of certain stored materials or covering materials as appropriate. Reuse of site won material on site (where possible) to reduce load/ cart/ tip off site.
Dry site surfaces	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Adherence to site and local public highway speed limits, dampening down of hard surfaces, use of Road-sweeper, as necessary.
Tipping dry materials on site	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Loads covered to point of tipping on site. Minimise source strength by means of low drop heights, profiling and shielding of piles from wind whipping, positioning sources away from receptors.

HGV loading	Atmospheric dispersion and mud dropping from HGVs.	Local businesses/ residents/ wildlife/ habitat	Visual soiling and airborne particulates	Minimise source strength by means of low drop heights, profiling and shielding of piles from wind whipping, positioning sources away from receptors. Cover loads as soon as loading is complete. Dampen down stockpiles of aggregates and spoil during excessive dry periods.
Vehicle exhaust emissions	Atmospheric dispersion	Local businesses/ residents/ wildlife/ habitat	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength/ all plant and vehicles hired from pre-approved providers/ Adherence to site speed limits. Stringent vehicle/ plant inspection and maintenance regime enforced on site/ No-Revving Policy enforced on site.

**Outturn Risk Assessment Following Sub-Consultant Report – Area B:**

Source	Pathway	Receptor	During Construction	Post Construction
Contaminated soils	Ingestion of soil Ingestion of dust Dermal contact	Construction workers	<p><b>Low risk</b></p> <p>Potential contact with soils on-site during construction works.</p> <p>Contamination sources not identified using screening thresholds for POS. No risk therefore from ingestion of soils.</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Risks from dermal contact mitigated by PPE.</p> <p>Risks from dust mitigated by damping down during dry / windy weather.</p>	<p><b>No risk</b></p> <p>Work will not be conducted within the adjacent residential garden areas.</p> <p>No contact with contaminated soils anticipated.</p>
	Inhalation of asbestos fibres	Construction workers	<p><b>Low risk</b></p> <p>Limited potential contact with ACM during construction works.</p> <p>Amosite fibres recorded in one previous ground investigation location (WS02 at 1.10 to 1.20m bgl).</p> <p>Of thirteen samples tested between February 2020 and April 2022, one sample recorded the presence of asbestos</p>	<p><b>No risk</b></p> <p>If present, asbestos contamination will be covered by macadam.</p> <p>No contact with asbestos contaminated soils anticipated.</p>

Source	Pathway	Receptor	During Construction	Post Construction
			<p>with quantification results of &lt;0.001%. This was encountered between 1.10 and 1.20m bgl, deeper than the proposed excavation depth (0.82m bgl), and is therefore not likely to be encountered during construction.</p> <p>A watching brief is required during excavation works for ACM. Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Risks from dermal contact mitigated by PPE.</p> <p>Risks from dust mitigated by damping down during dry / windy weather.</p>	The presence of the asbestos in the soils should be noted in the Health and Safety File for future reference.
	Leaching	Coal Measures	<p><b>No risk</b></p> <p>Contamination sources not identified.</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Near surface predominantly cohesive soils will limit infiltration potential.</p>	<p><b>No risk</b></p> <p>Contamination sources not identified.</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Roads and pavements are impermeable preventing infiltration.</p>
	Ingestion of soil Ingestion of dust Dermal contact Plant uptake	Ecological receptors	<p><b>No risk</b></p> <p>No receptors identified.</p>	<p><b>No risk</b></p> <p>No receptors identified.</p>

Source	Pathway	Receptor	During Construction	Post Construction
			<p>Contamination sources not identified</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p>	Contamination sources not identified
Landfill Gas	Inhalation of landfill gases	Residents in nearby properties.	<p><b>No risk</b></p> <p>No structures on site so no risk to construction workers.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, potential sources are to the west / northwest so the works will not impact any migration pathways. Soft standing is also retained near to the garden areas.</p> <p>The risk therefore remains the same as pre-construction.</p>
	Migration of gas into buildings	Adjacent Properties	<p><b>No risk</b></p> <p>No structures on site so no risk to buildings.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, potential sources are to the west / northwest so the works will not impact any migration pathways. Soft standing is also retained near to the garden areas.</p> <p>The risk therefore remains the same as pre-construction.</p>

### Outturn Risk Assessment Following Sub-Consultant Report – Area C:

Source	Pathway	Receptor	During Construction	Post Construction
Contaminated soils.	Ingestion of soil Ingestion of dust Dermal contact	Construction workers and residents in nearby properties	<p><b>Low Risk</b></p> <p>Potential contact with soils on-site during construction works.</p> <p>No visual or olfactory evidence of contamination was observed on site. No contamination sources identified with respect to POS screening values.</p> <p>No risk therefore from ingestion of soils. Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Risks from dermal contact mitigated by PPE. Risks from dust mitigated by damping down during dry / windy weather.</p>	<p><b>No risk</b></p> <p>Work will not be conducted within the adjacent residential garden areas.</p> <p>No contact with contaminated soils anticipated.</p>
	Leaching	Pennine Coal Measures	<p><b>Low risk</b></p> <p>No visual or olfactory evidence of contamination was observed on site. No contamination sources identified with respect to POS screening values.</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Near surface largely cohesive soils, will limit infiltration potential (confirmed by previous ground investigation).</p>	<p><b>No risk</b></p> <p>Contamination sources not identified. Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Roads and car park are impermeable preventing infiltration across most of the development site.</p>
Source	Pathway	Receptor	During Construction	Post Construction
	Migration	Perched groundwater	<p><b>Low Risk</b></p> <p>No contamination sources identified with respect to POS screening values.</p> <p>Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.</p> <p>Near surface predominantly cohesive soils will limit infiltration potential.</p>	<p><b>No Risk</b></p> <p>No contamination sources identified with respect to POS screening values.</p> <p>Roads and car park are impermeable preventing infiltration. Near surface predominantly cohesive soils will further limit infiltration potential.</p> <p>Levels are to be raised and suitable drainage measures implemented to minimise migration of groundwater from the site.</p>
	Run-off	Surface water	<p><b>Low Risk</b></p> <p>No contamination sources identified with respect to POS screening values.</p> <p>Limited potential for unanticipated contamination, to be assessed and remedial actions proposed if identified.</p> <p>Watercourse is culverted across the site so limited potential to receive run-off.</p>	<p><b>No Risk</b></p> <p>Levels are to be raised and suitable drainage measures implemented to prevent run-off.</p> <p>No contamination sources identified with respect to POS screening values.</p>

Source	Pathway	Receptor	During Construction	Post Construction
	Ingestion of soil Ingestion of dust Dermal contact Plant uptake	Ecological Receptors	<b>No risk</b> No receptors identified.  Contamination sources not identified Limited potential for unanticipated contamination – to be assessed and remedial actions proposed if identified.	<b>No risk</b> No receptors identified.  Contamination sources not identified.
Potentially infilled land	Inhalation of ground gases and landfill gas	Construction Workers	<b>Low risk</b> Filling ceased 35 years ago. No structures (with the exception of limited drainage) on site below existing levels. Possible risk to construction workers during below ground works due to gas (depleted O <sub>2</sub> levels and CO <sub>2</sub> ) as gas monitoring not undertaken, however this could be mitigated by monitoring and / or not working within excavations.	<b>No risk</b> Filling ceased 35 years ago. Proposed works could affect gas migration pathways as the site surface will be more impermeable than at present. However, the proposed works are to raise ground levels with granular fill adjacent to the residential properties in the east. Therefore, the granular fill would act as a vent, breaking the pathway for gas and there is no increase in risk.
	Migration of gas into adjacent residential buildings	Residents in nearby properties.	<b>No risk</b> Filling ceased 35 years ago. No building proposed.	<b>No risk</b> Filling ceased 35 years ago. Proposed works could affect gas migration pathways as the site surface will be more impermeable than at present. However, the proposed works are to raise ground levels with granular fill adjacent to the residential properties in the east. Therefore, the granular fill would act as a vent, breaking the pathway for gas and there is no increase in risk. It is proposed to remove the collapsed culvert on site and re-engineer inert fill. The risk therefore remains the same as pre-construction and provides betterment.
Source	Pathway	Receptor	During Construction	Post Construction
				The pond was present in the 1930s 15m from the site, and is therefore not considered to be generating significant gas given the amount of time since the pond was infilled. The risk therefore remains the same as pre-construction and provides betterment.

**Outturn Risk Assessment Following Sub-Consultant Report - Area D:**

Source	Pathway	Receptor	During Construction	Post Construction
Contaminated soils.	Ingestion of soil Ingestion of dust Dermal contact	Construction workers and residents in nearby properties	<b>Low Risk</b> Potential contact with soils on-site during construction works.  Contamination sources not identified although screening thresholds POS. No risk therefore from ingestion of soils.  Risks from dermal contact mitigated by PPE.  Risks from dust mitigated by damping down during dry / windy weather.	<b>No risk</b>  Work will not be conducted within the adjacent residential garden areas.  No contact with contaminated soils anticipated.
	Leaching	Pennine Coal Measures	<b>Low risk</b>  Some elevated PAHs were noted in made ground in the southeast of the site.  Near surface largely cohesive soils, will limit infiltration potential.	<b>Low risk</b>  Some elevated PAHs were noted in made ground in the southeast of the site.  Near surface largely cohesive soils will limit infiltration potential.  Roads and pavements are impermeable preventing infiltration.

Source	Pathway	Receptor	During Construction	Post Construction
Contaminated soils.	Surface runoff	Watercourse to the western corner of the site.	<p><b>Low risk</b></p> <p>Some elevated PAHs were noted in made ground in the southeast of the site. However, are in a topographical low.</p> <p>Some PAH also in the north centre of the site. This could be close the culverted watercourse and any run-off could discharge to surface water.</p> <p>Mitigation strategy – review whether contaminated soils will need to be removed from the site or if retained, an MMP or similar will be required.</p> <p>CEMP should include measures to prevent surface water run-off from the site into any watercourses.</p>	<p><b>No risk</b></p> <p>Some elevated PAHs were noted in made ground in the southeast of the site. However, are in a topographical low.</p> <p>PAHs in north central part of the site will be removed or capped preventing contact.</p>
	Ingestion of soil Ingestion of dust Dermal contact Plant uptake	Ecological receptors	<p><b>No risk</b></p> <p>No receptors identified.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, potential sources are to north and north-east, so the works will not impact any migration pathways.</p> <p>The risk therefore remains the same as pre-construction.</p>

Source	Pathway	Receptor	During Construction	Post Construction
Potentially infilled land	Inhalation of landfill gases	Construction workers Residents in nearby properties	<p><b>No risk</b></p> <p>No structures on site so no risk to construction workers.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, potential sources are to north and north-east, so the works will not impact any migration pathways.</p> <p>The risk therefore remains the same as pre-construction.</p>
	Migration of gas into buildings	Residents in nearby properties	<p><b>Low risk</b></p> <p>No structures on site so no risk to buildings.</p>	<p><b>Low risk</b></p> <p>Proposed works could affect gas migration pathways. However, potential sources are to the south, so the proposed works will not impact any migration pathways.</p> <p>The risk therefore remains the same as pre-construction.</p>

Source	Pathway	Receptor	During Construction	Post Construction
Landfill Gas	Inhalation of landfill gases	Construction workers	<p><b>No risk</b></p> <p>No landfills on or close to the site.</p> <p>No structures on site so no risk to construction workers.</p>	<p><b>No risk</b></p> <p>No landfills on or close to the site.</p> <p>Proposed works could affect gas migration pathways. However, adequate permeable areas exist between the sources and houses in the south east to allow any gas to vent to the atmosphere.</p> <p>The risk therefore remains the same as pre-construction.</p>
	Migration of gas into buildings	Buildings	<p><b>No risk</b></p> <p>No landfills on or close to the site.</p> <p>Proposed works could affect gas migration pathways. However, adequate permeable areas exist between the sources and houses in the south east to allow any gas to vent to the atmosphere.</p> <p>The risk therefore remains the same as pre-construction.</p>	<p><b>No risk</b></p> <p>No landfills on or close to the site.</p> <p>Proposed works could affect gas migration pathways. However, adequate permeable areas exist between the sources and houses in the south east to allow any gas to vent to the atmosphere.</p> <p>The risk therefore remains the same as pre-construction.</p>

Source	Pathway	Receptor	During Construction	Post Construction
Coal seams	Combustion	Construction workers Buildings	<p><b>No risk</b></p> <p>Coal seams have a potential of spontaneous combustion. However, the 36 Yard Coal Seam is not on the Governments list of 'Coal seams with a history of spontaneous combustion', therefore is not considered to be a significant risk.</p>	<p><b>No risk</b></p> <p>Coal seams have a potential of spontaneous combustion. However, the 36 Yard Coal Seam is not on the Governments list of 'Coal seams with a history of spontaneous combustion' therefore is not considered to be a significant risk.</p> <p>Seam in the south west corner of the site.</p> <p>A 1000mm inert clean cover will be placed above any coal encountered.</p>
Ground gas	Inhalation of ground gases	Construction workers	<p><b>Low risk</b></p> <p>No structures on site so no risk to construction workers.</p> <p>No gas which would result in explosion detected during recent monitoring.</p> <p>Depleted oxygen noted in BH03 and one occasion of high flow in BH005(S), care should be taken in below ground excavations.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, adequate permeable areas and open areas exist across the majority of the site.</p> <p>No gas which would result in explosion or asphyxiation detected during recent monitoring.</p> <p>The risk therefore remains the same as pre-construction.</p>

Source	Pathway	Receptor	During Construction	Post Construction
	Explosion	Buildings	<p><b>No risk</b></p> <p>No structures on site so no risk to construction workers.</p> <p>No gas which would result in explosion detected during recent monitoring.</p>	<p><b>No risk</b></p> <p>Proposed works could affect gas migration pathways. However, adequate permeable areas exist across the site</p> <p>No gas which would result in explosion detected during recent monitoring.</p> <p>The risk therefore remains the same as pre-construction.</p>

**Overview of Site Dust and Emission Controls to Disrupt Source-Pathway-Receptor Routes:**

- Where reasonably practicable, CR Reynolds shall prefer to adopt work practices/methods that minimise dust or debris.
- Work site and operations shall be set out to minimise dust (and emissions risk) to identified sensitive receptors.
- Site vehicle and plant operational movements to/ from site shall be minimised wherever reasonably practicable through effective planning of deliveries and collections.
- Ordering of materials to correct sizes to minimise the requirement for on-site cutting operations on site.
- Demolition, cutting and breaking equipment, such as pulverisers, road saws, cut-off saws and the like are to be fitted with dust suppression kits or local exhaust ventilation (LEV) to collect/ suppress dust.
- Minimising drop heights for materials loading/ offloading.
- Adherence to any working hour restrictions that have been placed on the project.
- CR Reynolds Limited shall ensure that a temporary water supply is available on site from commencement of work, through to completion of snagging. Water shall be used for temporary welfare and for use during site operations, including dust suppression and dampening down.
- Where an existing mains water supply is not available, alternative measures shall be made to ensure a sufficient store of water is available for site activities (e.g., importing and storing water for onsite use in IBC's or similar) from commencement.
- CR Reynolds Limited shall hire mechanical sweeping equipment, as necessary, to dampen down dust and remove detritus from surrounding hard surfaces and reduce track-out.
- Plant and equipment for use on site will be hired from pre-approved suppliers.
- All items of plant on site shall conform to the highest standards of emissions.
- All fuels for use on-site will be procured from a reputable supplier. All fuel on site will have the lowest sulphur content available at the time of purchase.
- Plant and equipment used on site will be operated by CPCS/ NPORS trained operators only.
- All plant and equipment shall be hired with evidence of a current Thorough Examination/ LOLER certificate from the hirer.
- Plant and equipment operators will undertake and record pre-use inspections, with any defects recorded and presented to the Site Manager for rectification.
- A quarantine arrangement for damaged or defective plant/ equipment on site shall be in place and controlled by the Site Manager.
- Stockpiles of dry spoil/ aggregates/ loose waste materials on site shall be temporarily sheeted over/ dampened down as necessary, particularly during windy/ dry conditions.
- Use of covered lockable skips on site (where available).
- Dampen down of hard surfaces as required during extended dry periods.
- Banksman/ traffic marshals shall be on site to ensure that all loads entering/leaving site areas remain covered, and vehicle wheels checked and washed before exit (as appropriate).
- Site operatives (including CR Reynolds Limited and subcontractor operatives) will receive a site-specific induction which will include the control measures stipulated in this document. This will include, but will not be limited to:
  - Reporting of a dust/ fume concern

- Onsite plant/equipment inspection and maintenance regimes.
  - Instruction on not to over-rev plant, or leave it idling unnecessary, generating unnecessary fume.
  - Adhering to site and surrounding national highway speed limits to reduce airborne dust disturbance from site vehicle and plant movements.
  - Use of dust suppression/ LEV/ dust capture technologies for plant/ equipment
  - Dampening down dry spoil/ aggregates and/ or covering as necessary to reduce wind-blown dust.
- 
- RAMS briefings, daily site briefings and environmental toolbox talks shall be delivered to site operatives during the Construction Phase raising awareness of dust and air emissions on site, their effects, and the control measures in place on site.
  - All subcontractors RAMS are to be reviewed by the Site Manager or Construction Director, prior to their commencement of works on site and shall include measures to control dust from their site activities, as and where required.
  - Where Asbestos Containing Materials (ACMS) are present, these shall be removed in accordance with the Control of Asbestos Regulations 2012 and associated guidance, prior to works commencing.
  - The Site Manager shall monitor current and forecast weather conditions, taking these into consideration when planning site work activities.
  - The burning of any waste, material, or other substance on site is prohibited in accordance with the site rules.

**Visual Monitoring:** The Site Manager retains responsibility for ensuring effective monitoring of site activities and the condition of surrounding areas with regards to dust, debris, and fume emissions from site activities.

The Site Manager will be supported in his role by the project Works Supervisor. Additional task monitoring will be implemented on site for activities that may generate dust. For example, banksmen will monitor the dust levels generated by plant movements and loading/ offloading of loose materials.

The monitoring of dust levels will be recorded in the Site Manager's diary. No monitoring of dust shall take place outside of normal site working hours however the site will be left in a condition where dust is mitigated as far as reasonably practicable, at the end of each working shift. The Site Manager will also monitor weather forecasts for the coming weeks. Where extended dry period/ drought conditions are forecast, CR Reynolds Limited shall ensure that enough water is stored on the site in advance of such conditions being forecast.

**Engagement with Local Community:** The assigned Public Liaison Officer, or Site Manager, shall circulate project contact details to property owners/ occupiers within an agreed radius of the site location, including any authorities.

This correspondence will include names of the Public Liaison Officer/ Site Manager, and other key Project Delivery Team members to aid effective collaboration and provide a reliable communication link with the site in the event of an environmental concern/ complaint.

**Reporting and Complaints Response:** All complaints regarding dust/ emissions shall be logged on a Dust/ Emissions Complaint Form (see Appendix F); these complaints may be direct, or indirect. Where a complaint regarding dust/ emissions generated from our site activities is received, CR Reynolds Limited's SHEQ and IMS Coordinator will assist the Site Manager and Construction Director in undertaking a thorough investigation. CR Reynolds Limited will respond to the complainant within a 48hour time limit. This response will be via a return email/ phone-call, depending on the complainant's preference.

All complaints will be investigated with investigations logged on our Integrated Management System

'HS&E Accident Incident Report Form' and Comments/ Compliments/ Complaints Log. Copies of these forms, together with then corresponding Dust Complaint Form' will be stored in the Site Managers SHEQ Files and reviewed by the SHEQ and IMS Coordinator for root-cause analysis and identification of trends.

Where trends are identified in complaints regarding dust/ emissions, the SHEQ and IMS Coordinator, Site Manager and Construction Director shall meet to review current control measures and discuss any additional control measures required to mitigate risk of a reoccurrence. Lessons Learned Reports shall also be written by the SHEQ and IMS Coordinator and disseminated across our business activities to raise awareness and improve environmental performance.

The Site Manager retains responsibility for the initial handling and recording of complaints regarding site operations. He will be supported in the role of investigation by the Public Liaison Officer (where assigned), SHEQ and IMS Coordinator and the project Construction Director.

If site monitoring, or complaint is received from the local community, or authority related to excess dust, debris, or noxious air emissions, proven to be generated solely by site activities, those site activities will temporarily cease until such time the site activity and control measures in question are reviewed and any additional measures deemed necessary are implemented to reduce risk of a reoccurrence.

**Actions When an Alarm is Raised:** In the event of a reported dust/ emissions incident, the following actions are to be taken:

1. The Site Manager will assess ongoing site activities and the nature of the activities prior to the alarm being raised, to work out the cause.
2. If the cause cannot be ascertained with 100% confidence, the Site Manager will temporarily suspend the dust/ particulate generating activities.
3. If the cause is within the site's control, the Site Manager on duty will take appropriate action in terms of dust/ particulate abatement. This may take the form of:
  - (a) Investigating the source of the dust/ particulates to prevent a re-occurrence.
  - (b) Suspending operations which are not being conducted using best-practice controls.
  - (c) Additional use of the dust abatement measures, or consideration of implementing further controls.
  - (d) Logging findings of a – c in the site diary, and reviewing of this CEMP document

In all cases, any new Lessons Learned from investigations are to be considered by the company and communicated/ implemented across the business to prevent a reoccurrence.

## 2.2 Flooding/ Surface Water Run-Off and Water Discharges

According to the Kirklees Council Flood Risk Assessment /Drainage Impact Assessment Technical Note, 'the three sites are located within Flood Zone 1 – ref. EA Flood Map for Planning. The risk of flooding from Main River is considered to be LOW / Negligible.' It is noted that an existing watercourse runs through Area C. Where a Flood Risk Activity Permit is required, CR Reynolds Limited shall work in collaboration with the client and associated stakeholders to apply for the permit, and plan and deliver the works in accordance with it.

To mitigate the impact of potential flooding on site activities, the Site Manager shall monitor the weather forecast daily. He shall also monitor the Environment Agency/ Government flood risk information pages. Where there is a forecasted flood risk that could impact site activities, emergency arrangements will be made to ensure that, where reasonably practicable, all persons, resources and waste are relocated away from the flood risk area, or to any existing surrounding higher ground. Suitable temporary pumping/ de-watering equipment will be made available for use on site as required.

Ongoing Site SHEQ inspections by the Site Manager shall ensure that any existing permanent drainage systems, or existing waterways/ water bodies are not compromised by the construction works at any time.

No foul or surface water will be allowed to discharge into any unauthorised receptor. Additionally, any existing surrounding open water outfalls and sluices will be kept working satisfactorily; if found not to be, immediate liaison with the regulatory authorities and client/ land owner will be required.

Copies of any required water discharge authorisations will be kept on site at Appendix J of this document and retained in the Site SHEQ Files. The Site Manager shall ensure that any foul, or surface, water is discharged into the correct drainage system and that RAMS briefings and toolbox talks are provided on the use of any temporary pumping equipment.

### 2.3 Contamination

Waste material removed from the site will be carefully handled to ensure there is no risk of entry of potential contaminants into a waterway, waterbody, or any other sensitive receptor. All task risk assessments and method statements shall detail (where relevant) measures to be taken for handling of materials and waste.

Should contaminated ground or material be encountered/ suspected during these works, operations in that area shall cease immediately and the Client's Project Manager notified immediately. The work area will be secured, and a UKAS-accredited laboratory shall be appointed to undertake necessary sampling and analysis works. Recommendations with regards to removal of any confirmed contaminated materials shall be sought and removed from site by a licensed waste management subcontractor, to a licensed facility. Methods for removal of any confirmed contaminated materials will be completed following current legislation and industry best practices.

To eliminate/ minimise risk of skin contact with previously unidentified contaminated materials, all spoil arisings and waste shall be removed mechanically. In addition, where works within these areas do require manual labour, toolbox talks, appropriate PPE and welfare facilities shall be provided for use by all operatives on site for washing, eating, and drinking. The site will also be no-smoking sites, to reduce the risk of inadvertent contact/ ingestion of contaminants.

**Asbestos:** Where any demolition is necessary, a Pre-Demolition Survey shall be undertaken, and any ACMs identified removed prior to demolition of the building. Any task on site that is likely to disturb existing ACMs shall be undertaken in accordance with the Control of Asbestos Regulations 2012, Approved Codes of Practice and relevant HSE guidance documents. These documents shall form the basis of detailed risk assessments and method statements for these tasks. All ACMs should be removed by a pre-approved subcontractor, employing suitably trained people. On the removal of ACMs, a 'clean air; certificate shall be requested, before allowing works on the demolition of the building to commence.

All CR Reynolds Limited Site Managers and operatives are UKATA Asbestos Awareness trained and receive regular refresher training. Where specific Asbestos training, over and above Asbestos Awareness is required to safely complete tasks on site, then this shall be provided by CR Reynolds Limited, as required. Site Inductions, RAMS briefings and toolbox talks shall communicate associated risks, the control measures and emergency measures to be taken, including what to do in the event of identifying suspected ACM materials.

**Suspected ACMs:** Where further/ suspected ACMs are identified during the works, the following measures shall be implemented:

- Stopping work immediately.
- Secure area.
- Keep the spoil and excavation damp.
- Wash down the excavation equipment.

- Collect all run-off water from washing down.
- Employ a UKAS accredited laboratory to analyse a sample for asbestos.
- Keep good records as part of the site asbestos management plan.
- Arrange for removal/disposal of confirmed ACM materials/contaminated materials in accordance with The Control of Asbestos Regulations 2012 and other applicable legislation and guidance.
- Disposal of confirmed ACM by HSE-licensed contractor (where required).
- Where a licensed contractor is employed to remove ACM, a certificate, or other written confirmation shall be sought that the identified ACM have been removed, and works are safe to continue.

**Disposal of ACMs:** Following removal of Asbestos, CR Reynolds Limited shall provide copies of Waste Consignment Notes and any associated Air Clearance Certificates (where appropriate) for inclusion in the Health & Safety File. A plan shall also be marked up to indicate where Asbestos has been removed from and to.

**Subcontractors:** Where it is envisaged that subcontractor work may expose workers to ACMs, then CR Reynolds Limited shall review said subcontractor's RAMS to satisfy themselves that all the relevant control measures are being implemented to eliminate/reduce risk of exposure. CR Reynolds Limited shall share relevant information with all subcontractors to ensure they can satisfy themselves of the existing ground conditions and make adequate allowances within RAMS documentation.

While RAMS shall detail any relevant protective measures to prevent inadvertent land contamination from site operations, a site Spillage Response Plan will be in place to manage any spillage incidents that may occur. The Spillage Response Plan will be reviewed regularly during the Construction Phase and will be put into action where unanticipated spillages occur (see Appendix C for the outline Spillage Response Plan).

## 2.4 Waste Management

In line with the project Contract Data Part 2 requirements, CR Reynolds Limited shall:

- Implement Site Waste Management Plans (where applicable) throughout the contract period
- that comply with regulatory requirements and include in such Plans project-specific targets
- for waste recovery and reused and recycled content (below) and for waste reduction.
- Measure and report progress against the corporate KPIs for the quantity of waste produced
- and the quantity of waste sent to landfill (measured in tonnes per £100k construction value)
- using the WRAP Waste to Landfill Reporting Portal and guidance.
- Report performance for construction, demolition (including strip out) and excavation waste
- streams separately using the WRAP Waste to Landfill Reporting Portal and guidance.
- Reduce Waste to Landfill to less than 4 tonnes per £100k construction value and aim to send
- less than 2 tonnes to Landfill per £100k construction value.
- Recover at least 70% of construction materials and aim to exceed 80%.
- Recover at least 80% of demolition, strip-out and excavation materials (where applicable)
- and aim to exceed 90%.
- Ensure that at least 15% of total material value derives from reused and recycled content in
- new construction, select the top opportunities to exceed this figure without increasing the cost of materials, and report actual performance

CR Reynolds Limited shall minimise waste from site activities, where reasonably practicable to do so. To minimise waste generated, we will explore the reuse of site won materials where the material is deemed suitable for reuse, and by prior agreement with the client and Principal Designer.

All waste collection and waste management subcontractors shall be selected from a pre-approved list and appointed formally by the Procurement Manager. CR Reynolds Limited shall, before the commencement of the works, have in its possession all relevant waste management licenses for the

waste disposal facilities it proposes to use and Waste Carrier Licences from appointed hauliers and subcontractors. Copies of all licences, Waste Transfer/ Consignment Notes and permits shall be kept in the Site Office, within the Site Manager's SHEQ Files. This documentation shall be kept together with the project Site Waste Management Plan, which shall be updated as works progress.

Where site constraints allow, CR Reynolds Limited shall adopt waste segregation measures on site and, through proactive collaboration, encourage re-use/ recycling of waste materials from all construction/ breaking out activities to reduce waste to landfill.

- See Appendix H for copies of Waste Disposal Facilities Licences obtained to date (these will be updated as works progress and recorded in the Site Manager's SHEQ Files).
- See Appendix I for copies of Waste Carriers Licences obtained to date (these will be updated as works progress and recorded in the Site Manager's SHEQ Files).

Good housekeeping standards shall always be maintained on site. This requirement will be communicated through site induction and assured through a rigorous internal and external site inspection regime. As part of the housekeeping regime on the site, work areas shall be cleared on a regular basis throughout the Construction Phase, and on completion of the works. Any waste concrete, slurry or wash water from concrete or cement activities will not be discharged, intentionally or unintentionally, into a waterway/ waterbody, other sensitive receptor, or drainage. Concrete and cement mixing and washing areas will be contained and sited at least 10 metres from any waterway/ waterbody, or surface water drain.

## **2.5 Energy Management**

Where available from our suppliers, temporary site welfare facilities shall be of 'eco-type', equipped with energy saving devices, fixtures, and fittings such as heating timers, PIR, and LED lighting. The Site Manager shall also endeavour to ensure that minimal wastage of energy occurs at the site. All site plant and equipment shall be selected, taking into consideration, manufacturer specified energy consumption levels.

Through the site induction and environmental toolbox talks, site personnel will be encouraged to switch plant and equipment off when not in use and will similarly be encouraged to switch off equipment and close doors when welfare units and rooms within these are not in use.

## **2.6 Storage of Materials and Spillage Control**

CR Reynolds Limited operates a procurement policy and procedures which prefer the use of materials and/ or substances that cause no/ minimal risk to health, safety, or the environment.

COSHH assessments for all potentially hazardous materials used during the site works are to be included in the Construction Phase Health and Safety Plan. All liquids will be stored in appropriate containers which are clearly labelled and shall be stored in a secure store, on drip trays of no less than 110% capacity of the container(s). Drip trays shall be regularly checked by the Site Manager or Works Supervisor and emptied, as necessary.

Diesel storage on site will be within a double bunded bowser, with suitable spill kits available at the point of refuelling in case a spillage occurs. All refuelling of plant will be undertaken within a designated fuelling area, located at least 10m away from any watercourse/ drain/ sensitive receptor. The CR Reynolds Limited appointed Site Manager, or Works Supervisor, will supervise and control all refuelling processes.

A plant safe, plant nappies, and spill kits shall be used on site during the storage and use of plant and equipment containing fuels and/ or lubricants. All plant, materials, substances, and waste shall be

stored a suitable distance away from existing drainage systems, adjacent waterbodies, waterways, and sensitive receptors to reduce the risk of inadvertent entry.

The Spillage Response Plan is outlined in Appendix C of this document and site staff will be trained in the correct use of the spill kits and plant nappies and ensuring plant is not stored adjacent to any existing natural watercourses/ bodies, drainage systems or other sensitive receptors. If weather is excessively poor, then operations to cease to ensure risk of potential contaminated run off is minimised.

Any oil, fuel, or chemical spill into the river from site operations shall be notified to the relevant authorities within 24 hours.

Any other measures not described above and referred to in the site information documents shall be adhered to at all times.

## 2.7 Noise and Vibration

Site hours will adhere to any stipulated Local Planning Authority/ contractual restrictions. Should works outside stated hours be required, they will be agreed in writing after consultation with the Client's Project Manager and by the agreement of the Local Planning Authority. Prior to works commencing, we will consult with Kirklees Pollution and Noise control team to discuss and confirm our plans for the works.

**Noise:** It is recognised on this project that the main construction related noise generated on this site will be from breaking out works and the general movement/ operation of plant and vehicles to, from, or on the site. The following mitigation measures shall be implemented to reduce the potential noise disturbance:

- Use of noise monitoring equipment on site as required.
- Work methodologies shall be chosen based on minimising noise as far as reasonably practicable.
- Select the most appropriate available plant to ensure that neighbourhood noise is kept to a minimum.
- Ensure that all plant and equipment is properly maintained in accordance with the manufacturer's guidance to avoid unnecessary noise.
- All plant and machinery to make full use of suppressors, silencers and other means of noise reduction and shall comply with the Code of Practice.
- Ensure that plant which is used intermittently is shut down, or throttled back, during periods of non-use.
- Consider at an early stage the most appropriate siting of plant, access roads and compound areas relative to noise sensitive locations such as residential dwellings, schools, and offices (when occupied).
- No construction activities are to take place outside of the permitted working days and hours without prior written permission provided by the Project Manager, as listed in Appendix 1/7 of the tender documents.
  
- Where operations require the use of compressors and breakers the following conditions shall apply:
  - Compressors shall be silenced by all effective means and covers shall remain closed except when access is required.
  - Breakers shall be fitted with muffles and, where it would prove effective, dampened tools and accessories shall be used.
  - Pumps and generators shall be located, wherever possible remote from occupied premises.
  - Some plant, equipment, and operations may be acoustically screened to prevent disturbance to the nearest noise sensitive facade.

**Noise Monitoring and Hearing Protection Zones:** The site management team will have noise monitoring equipment available on site and will carry-out background noise level readings prior to the commencement of works and take further readings on a regular basis throughout the execution of the works. Noise levels will be checked for all plant/ work operations. The readings will be recorded on noise level assessments to determine whether ear protection is required (and what A-Weighted noise level (dB) protection factor) and the limits of any required exclusion zone around the work operation Ear protection signage will be erected at the perimeter of the exclusion zone to identify that appropriate ear protection must be worn.

Noisy work areas, and the requirement for wearing ear protection, will be identified, and brought to the attention of all new starters on site when they attend their project site induction, prior to commencing work. This requirement will also be regularly reinforced prior to the commencement of new works, and via toolbox talks. The type of ear protection required will be identified on the noise assessments and in the work specific method-statement, and a supply of ear protection PPE will be always kept on site.

**Vibration:** The main construction related vibration generated on this site will be from breaking out and general construction activities. Use of site plant and equipment, as well as HGVs travelling to/ from site may also create a source of vibration. The following mitigation measures shall therefore be implemented to reduce the potential vibration impact:

- On-site operations and task methodologies adopted based on minimising vibration as far as reasonably practicable.
- Plant and equipment used on site to be hired from pre-approved, reputable hire companies.
- Select the most appropriate available plant to ensure that neighbourhood noise is kept to a minimum.
- Selection of heavy plant used on the site will be take vibration output into consideration, as necessary.
- Plant and equipment chosen to be fitted with vibration reduction technology (as and when required).
- All plant and equipment on site shall be maintained in accordance with legal and manufacturer's requirements and kept in good order whilst on site.
- All plant operators on site shall be formally trained in specific plant operations.
- Plant operators will be advised at site induction not to over-rev plant or leave plant idling unnecessarily.
- All plant/ equipment to be turned off when not in use.
- No construction activities are to take place outside of the permitted working days and hours without prior written permission provided by the Project Manager, where listed in the tender documents.
- Reducing construction related traffic by reusing site-won material (as far as reasonably practicable)

Further to the above works shall be carried out in strict accordance with the Waterman report WIE14496-105-R-21.2.2.

## **2.8 Utility Supplies and Subcontractors**

**Utility Supplies:** breaking out and excavation works on the site shall be undertaken in accordance with HSG47 and associated legislation and guidance. Utility location plans for all chartered local utility cables, pipelines and associated plant/equipment will be obtained and filed within the Construction Phase Health and Safety Plan and/ or Site Manager's SHEQ Files for on-site reference. The Construction Phase Health and Safety Plan for the project details the health and safety measures to be undertaken to reduce the risk of encountering any existing utilities during the works. Prior to works commencing on site, and any tasks during the construction phase, survey/investigation works shall be undertaken to identify below-ground utilities (as far as reasonably practicable).

**Subcontractors:** CR Reynolds Limited's subcontractors are assessed from an environmental perspective as part of the CR Reynolds Limited Integrated Management System and associated supplier/ subcontractor approval procedures. Only subcontractors appearing on our Approved Suppliers List will be appointed to this project. Subcontractors will be made aware of the importance of Health and Safety and Environmental issues and will be closely supervised by CR Reynolds Limited site staff. CR Reynolds Limited check the competence of their subcontractors based on an interview, past experience, membership of professional organisations and use of accredited site personnel. CR Reynolds Limited will undertake a performance review of subcontractors to monitor performance. A poor review can, in extreme cases, lead to the subcontractor being removed from our Approved Subcontractors and Supplier List.

## **2.9 Site Transport and Site Deliveries/ Collections**

The main access for all construction traffic to the site will be via surrounding highways. The direction of travel to/ from the site is to be in accordance with local authority constraints. A Site Traffic Management Plan will be developed, prior to works commencing on site.

Parking on any adjacent public highways/ footpaths or verges will be avoided. The Site Traffic Management Plan will indicate the designated area for the unloading and storage of plant and materials with waste bins and spill kits within easy reach so any delivery waste or spills can be managed effectively and efficiently. All temporary traffic directional and warning signage shall be erected and maintained following the agreed Site Traffic Management Plan.

All site deliveries will be arranged to avoid a detrimental impact on traffic flows and access to the premises in the area. For delivery/ collections the driver will phone the site in advance of the time of arrival (this includes all Grab, Tipper, and large vehicles). Site delivery routes shall be submitted with all orders placed by our Procurement Department, with an agreed "code of practice/ conduct" for delivery vehicles provided.

Banksmen will be present to meet and direct deliveries to the location on site, where unloading will take place. The Site Manager will ensure that any changes to delivery routes, unloading points or traffic routes are circulated to the Works Supervisor to minimise any disruption to site activities.

On appointment, our Procurement Manager shall issue all subcontractors and suppliers shall be issued with:

- A copy of directions to site and Site Traffic Management Plan
- Site contact details
- Any relevant details regarding working hours and delivery restrictions to avoid peak travel times etc.
- Site-specific delivery/ collection protocols.

Control measures to prevent deliveries causing queuing traffic and congestion at peak times will be implemented, by the Site Manager. These will be planned in advance and may include taking deliveries off peak or altering work sequences and programming.

Outside the site, excess/ unnecessary journeys will be kept to a minimum wherever possible. Adjacent highway conditions will be monitored daily, and road sweepers will be used as appropriate to ensure highways are kept free from mud, dust, and debris track-out. Banksmen/ traffic marshals shall also be available to ensure loads are secured and sheeted and the condition of vehicles are checked before they leave the site.

## **2.10 Site Induction and Environmental Management System Awareness**

All CR Reynolds Limited staff invited visitors and subcontractors will be formally inducted by the Site Manager before being allowed to enter the site.

A copy of the company Environment Policy will be displayed on the site noticeboards and contents of this plan brought to the attention of all personnel during the induction, together with any necessary specific environmental requirements.

RAMS briefings shall also include environmental concerns pertinent to each task, and additional toolbox talks on site specific environmental issues shall be undertaken.

## 2.11 Site Security

Any existing site security measures and solid boundaries will be supplemented by CR Reynolds Limited providing 2m high, anti-climb heras fencing around the site compound, main site work area, and any localised work areas, outside of the main work area.

Where necessary, temporary heras fencing may be substituted with Chapter 8 compliant traffic management (subject to work area and risk assessment). All temporary fencing, signage and barriers shall be implemented in accordance with agreed temporary traffic management plans.

Site boundaries shall be supplemented by appropriate health and safety, and directional signage which will be erected to warn of the dangers of construction sites and to direct the public around site areas.

**Temporary, Fencing and Signage:** All heras fencing and barriers used on site shall be erected and maintained following the manufacturer's guidance and best practice with stabilisation provided, as required to maintain structural integrity. The Site Manager shall retain responsibility for inspecting and maintaining all site perimeters and temporary site signage to ensure they remain intact and in good condition. This will be achieved through daily informal checking and form part of the Site Manager's weekly formal Site Inspection regime.

**Site Access:** To maintain site security, all site work and compound gates shall always remain closed (unless persons or vehicles/plant are negotiating access). The Site Manager will retain responsibility for ensuring all site operatives and invited visitors sign in and out of the site, daily, using the Daily Site Register. Site operatives shall be informed at site induction to ensure that work areas, compound area and welfare facilities are to remain secure/ closed at all times, particularly when there is no attendance (e.g., during breaks and out of site working hours).

**Welfare Security:** All hired temporary site welfare units shall be of anti-vandal construction and shall remain locked and secure when not in use. At the end of each shift, items of value shall be removed from welfare and welfare shutters and doors will be locked/secured.

**Plant and Equipment Security:** Where available, all hired plant shall be fitted with security devices, trackers, and shutters to prevent unauthorised access and use. During the day, when plant is in use, plant keys shall remain with the operator and be his/her responsibility.

After each work day/ shift has finished, CR Reynolds Limited's Site Manager or Works Supervisor will check that all items of plant/ machinery have either been secured in the site plant safe, immobilised, or placed in such a position that it cannot readily be moved. All plant keys will be removed from the machinery and stored in a lock-fast cabinet or removed from the site.

Smaller items of site equipment shall be removed from site areas at the end of the working day/shift and stored in the site plant safe/ site store container.

## 2.12 Visual Impact and Temporary Lighting

**Visual Impact:** Regular formal site inspections of the site, site boundaries/ temporary fencing/ hoarding shall ensure that any perceived negative visual impact is kept to a minimum (e.g., vandalism/ damage to fencing, graffiti, or litter).

**Temporary Lighting:** It is anticipated that the majority of these works shall be completed within daylight hours, eliminating the need for any temporary lighting on site. Where temporary task lighting is deemed necessary, CR Reynolds Limited shall ensure that a 'sensitive lighting strategy' is incorporated.

As such, consideration shall be given to ensuring that temporary lighting is directed and positioned away from adjacent sensitive receptors.

Where temporary lighting is required, it shall be provided from a tested 110V supply to reduce noise from generators. Where 110V powered lighting cannot be used then either solar powered, or self-generated lighting units shall be selected with silenced features to reduce noise. Shrouds shall also be fitted to temporary lighting to increase lighting efficiency, reduce light overspill, nuisance, and glare.

All temporary lighting on site shall be chosen for suitability of application and have energy saving features (where available). All temporary lighting shall be under the control of the Site Manager, who shall review the requirements for lighting throughout the Construction Phase.

### **2.13 Listed Buildings and Archaeological Sites**

It is not anticipated that any nearby Listed Buildings or Archaeological sites will be affected by works. Where identified, the location of these will be advised during site inductions.

### **2.14 Ecological Constraints and Control Measures**

There are various ecological reports for each phase of the project. The A629 Halifax Road - Phase 5 Improvement Scheme Technical Note – Ecological Impact Assessment Executive Summary document, written by Waterman Group states -

*'...no Important Ecological Features (IEFs) are anticipated to be affected by the Scheme due to insufficient biodiversity conservation value or a lack of an identified pathway for potential effects to occur (see Appendices A-C for Scheme details and rationale of ecological features scoped out of assessment). However, to ensure legal and planning policy compliance, mitigation and ecological enhancement measures will be provided as part of the Scheme, as detailed within the respective EclA reports.'*

Therefore, any recommended control/ mitigation measures described within ecological reports for this project shall be implemented by CR Reynolds Limited during programming and delivery of the works. Where additional ecological surveys are required, these shall be undertaken and the recommendations from these surveys written into this plan and associated task RAMS.

### **2.15 Impact from/ to Neighbours**

Prior to and during these works, CR Reynolds Limited's Public Liaison Officer and/ or Site Manager shall liaise/ communicate with adjacent property owners who are likely to be affected by the works. Communication with these parties will be mainly through meetings, pre-start and ongoing letter drops, and informal face-to-face discussions. Contact details for the site shall be advertised/ distributed as necessary to ensure a point of contact is provided to raise a concern/ comment/ compliment.

### **2.16 Emergency Procedures**

All health, safety and environmental emergencies are reportable to the Site Manager. It is the responsibility of the Site Manager to assess the emergency and contact the relevant emergency services and relevant authorities. Emergency procedures are communicated in the site induction with emergency routes and muster points identified at this point along with signage erected on site.

### **2.17 Registers of Legislation and Aspects and Impacts**

A full register of legislation and Register of Aspects and Impacts is kept electronically within the CR Reynolds Limited, ISO14001 accredited, Integrated Management System. This register is fully accessible for reference to all project teams via a secure Citrix remote desktop link.

### 2.18 Housekeeping

Before the end of each shift, the Site Manager will endeavour to ensure that the site will be safe and secure until the commencement of the next shift. All general waste generated from the day to day running of the site will be placed into the relevant skips on site. All debris from the works i.e., breaking out / excavation accruals will be removed by licensed waste carrier or made safe on site. Housekeeping standards during the working day will be monitored daily by the Site Manager, and on a monthly basis by the appointed HSE Consultants, Building Safety Group through the site inspection and auditing regime.

## CHAPTER 3 SIGNIFICANT PROJECT ENVIRONMENTAL RISKS AND ACTIVITIES

### 3.1 Significant Project Environmental Risks

At the project environmental planning meeting, an Environmental Risk Assessment is implemented to identify the significant project environmental impacts and aspects from day-to-day site activities.

Project significant environmental risks are entered in Table A below, to reflect the environmental risk assessment for the project. CR Reynolds Limited. recognises that site operations, waste management and storage/ handling of fuels are high risk activities, therefore these will be managed with the upmost importance.

**TABLE A: PROJECT SIGNIFICANT ENVIRONMENTAL RISKS**

Project activity	Potential impact	Risk rating (H/M/L)	Controls detailed in Table B
Breaking out and construction works.	Noise, vibration, air, and light pollution, disturbance/ impact on wildlife, and damage to the surrounding habitat including – <ul style="list-style-type: none"> <li>• Biodiversity Zone</li> <li>• Birds</li> <li>• Fish</li> <li>• Bats</li> <li>• Invasive Species</li> <li>• Nocturnal Fauna</li> </ul>	H M H H L M	✓
Storage of fuels, oil, and chemicals.	Land and water pollution, disturbance/ impact on wildlife.	H	✓
Waste disposal	Land pollution, transport, odours nuisance, fly-tipping, impact on wildlife	M	✓
Litter	Pollution, nuisance, impact on wildlife	M	✓

Washing down and water discharges	Water pollution, impact on wildlife	M	✓
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### 3.2 Project Significant Risk Activities

The project environmental risks are controlled through arrangements detailed within Table B below, supplemented by the controls detailed in Chapter 2 above.

Site Managers, or a nominated representative, must ensure Table B is reviewed and maintained, and if necessary revised, throughout the life of a project. Site Managers must ensure the significant environmental risks, listed in Table A above, are suitably controlled

'Additional project specific compliance action' in the boxes on the following pages for each aspect has been addressed. If necessary, the Site Manager will amend them, as necessary. Aspects in the

“generic plan” which do not apply to this project have been deleted.

**TABLE B Project Significant Risk Activities**

Aspect	Noise and Vibration Nuisance
Impacts upon	Client/ businesses/ wildlife
Applicable Legislation	Duty/ Prohibition
<b>Wildlife and Countryside Act 1981</b>	Prohibits actions to: Intentionally kill, injure, or take any wild bird. Intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built. Intentionally take or destroy the egg of any wild bird. Have in one's possession or control any wild bird, dead or alive, or any part of a wild bird, which has been taken in contravention of the Act or the Protection of Birds Act 1954. Have in one's possession or control any egg or part of an egg which has been taken in contravention of the Act or the Protection of Birds Act 1954. Use traps or similar items to kill, injure or take wild birds. Have in one's possession or control any bird of a species occurring on Schedule 4 of the Act unless registered, and in most cases ringed, in accordance with the Secretary of State's regulations (see Schedules). Intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.
<b>Noise and Statutory Nuisance Act 1993</b>	Prohibits the creation of a statutory nuisance through noise caused by the use of a vehicle, machinery, or plant / equipment. Having satisfied itself that a statutory nuisance exists, the Local Authority must serve an abatement notice.
<b>Environmental Protection Act 1990 – Part III</b>	It is an offence to create statutory nuisance such as smoke, fumes, dust, odour, or noise. An Environmental Permit has been secured for this project.
<b>Control of Pollution Act 1974 Part III</b>	Defines as a statutory nuisance any noise emitted from premises including construction sites. Provides for the creation and management of noise abatement zones
<b>Clean Neighbourhoods and Environment Act 2005</b>	Local authorities can enter premises (without force) within an ‘alarm notification area’ to silence an alarm that has been ringing for over 20mins. (Note LA must notify occupiers if they have designated the property to be within an alarm notification area).
<b>The Town and Country Planning (Environmental Impact Assessment) Regulations 2017</b>	Duty to carry out appropriate assessment to minimise environmental impact.
<b>The Habitats Regulations</b>	The regulations the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. The Regulations provide these sites with protection through the designations of Special Areas of Conservation (SACs), which provide protection to a variety of special species and habitats, and Special Protection Areas (SPAs), which provide protection for rare and vulnerable birds and their habitats.

<b>Mandatory minimum compliance action</b>	<b>Noise and Vibration Nuisance</b>
<ul style="list-style-type: none"> <li>• Work methodologies shall be chosen based on minimising vibration.</li> <li>• Use of noise and vibration monitoring equipment and regime.</li> <li>• Plant/ equipment chosen to be fitted with noise and vibration reduction technology (as and when required).</li> <li>• Reducing construction related traffic by re-suing site won material (where reasonably practicable), thus number of HGV movements.</li> <li>• Adhere to any working hour restrictions that have been placed on the project.</li> <li>• Be extra vigilant at avoiding inadvertent excessive noise during night-time operations.</li> <li>• No noisy works at night (as far as is reasonably practicable)</li> <li>• Vehicle movements (including deliveries) shall be planned to avoid local peak and unsociable hours, keeping disruption of neighbours to a minimum.</li> <li>• Plant and equipment used on site to be hired from pre-approved, reputable hire companies.</li> <li>• Selection of plant and equipment shall consider noise output.</li> <li>• Plant/ equipment chosen to be fitted with noise reduction technology and appropriate shrouding etc.</li> <li>• All plant and equipment on site shall be maintained in accordance with legal and manufacturer's requirements and kept in good order whilst on site.</li> <li>• All plant operators on site shall be formally trained in specific plant operations.</li> <li>• Plant operators will be advised at site induction not to over-rev plant or leave plant idling unnecessarily.</li> <li>• All plant/ equipment to be turned off when not in use.</li> <li>• Where deemed safe to do so, audible warning sirens to be disabled on site plant to minimise noise disruption to neighbours.</li> <li>• Work methodologies shall be chosen based on minimising noise.</li> <li>• Where necessary acoustic barriers will be erected around specific operations within the site which may generate excessive noise.</li> <li>• Where audible intruder alarms have been fitted in a Local Authority 'alarm notification area,' the occupier must nominate a key-holder for the premises and notify the Local Authority of the contact details of that key-holder.</li> <li>• If works are to be undertaken in the breeding season for birds, then a site walkover will be conducted in advance of the work commencement in order to ensure the absence of any nests etc.</li> </ul>	

<b>Additional project-specific compliance action</b>	<b>Noise and Vibration Nuisance</b>
<ul style="list-style-type: none"> <li>• Site working hours in accordance with Local Planning Authority restrictions.</li> <li>• No construction, breaking out or site clearance operations are permitted outside of designated working days/ times without prior written consent by Local Planning Authority.</li> </ul>	

<b>Explanation of action</b>	<b>Noise and Vibration Nuisance</b>
<p>All CR Reynolds Limited. sites have the potential to cause a statutory nuisance, e.g., during excavation works. This is acknowledged as good practice and courteous. Informed neighbours are much less likely to complain. It is an offence to fail to nominate a key-holder or to fail to notify the Local Authority of the relevant details within 28 days of when the 'alarm notification area' came into force. Can lead to a fine and or imprisonment, depending on the nature of the offence.</p>	

<b>Person Responsible</b>	Site Manager	<b>Noise and Vibration Nuisance</b>
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<b>Checked/ Verified by</b>	Weekly and monthly site inspections, Internal auditing.
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Aspect	Dust/ Emissions
Impacts upon	Client/ businesses/ wildlife
Applicable Legislation	Duty/ Prohibition
<b>Clean Air Act 1993</b>	Controls the release of dark and black smoke, grit, dust, and fumes from various sources. Local authorities can impose limits on dust, emissions and odours generated from site.
<b>Control of Asbestos Regulations 2012</b>	Employers must prevent exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest level. The control limit for asbestos is 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm <sup>3</sup> ).
<b>Anti-Pollution Works Regulations 1999</b>	The Regulations prescribe the contents of anti-pollution works notices, which the Environment Agency can place upon people or sites in the event of actual or potential pollution incidents. Such notices can be given if, in the Environment Agency's opinion, substances or waste have entered or are likely to enter the atmosphere.
<b>Environmental Protection Act 1990 – Part III</b>	It is an offence to create statutory nuisance such as smoke, fumes, dust, odour, or noise.
<b>Building Act 1984 (sections 80-82)</b>	Applies to demolition of buildings and requires prior notification to the Local Authority of a method statement before work begins. To ensure that effective dust management options are undertaken, conditions can be placed on the demolition notice - under Section 82(J) of the Building Act 1984.
<b>The Town and Country Planning (Environmental Impact Assessment) Regulations 2017</b>	Duty to carry out appropriate assessment to minimise environmental impact.
<b>The Habitats Regulations</b>	The regulations the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. The Regulations provide these sites with protection through the designations of Special Areas of Conservation (SACs), which provide protection to a variety of special species and habitats, and Special Protection Areas (SPAs), which protect rare and vulnerable birds and their habitats.

Mandatory minimum compliance action	Dust
<ul style="list-style-type: none"> <li>• Where reasonably practicable, CR Reynolds shall prefer to adopt work practices/methods that minimise dust or debris.</li> <li>• Work site and operations shall be set out to minimise dust (and emissions risk) to identified sensitive receptors.</li> <li>• Long track-out distance on private access road, between site location and public highway.</li> <li>• Site vehicle and plant operational movements to/from site shall be minimised wherever reasonably practicable through effective planning of deliveries and collections.</li> <li>• Ordering of materials to correct sizes to minimise on-site cutting operations on site.</li> <li>• Cutting and breaking equipment, such as road-saws, cut-off saws and the like are to be fitted with dust suppression kits or local exhaust ventilation (LEV) to collect/suppress dust.</li> <li>• Minimise drop heights for materials loading/ offloading.</li> <li>• Adherence to any working hour restrictions that have been placed on the project.</li> <li>• Where reasonably practicable, CR Reynolds Limited shall prefer to adopt work practices/methods that minimise dust or debris.</li> </ul>	

**Mandatory minimum compliance action**

**Dust**

- Work site and operations shall be set out to minimise dust (and emissions risk) to identified sensitive receptors.
- Site vehicle and plant operational movements to/ from site shall be minimised wherever reasonably practicable through effective planning of deliveries and collections.
- Ordering of materials to correct sizes to minimise requirement for on-site cutting operations on site.
- Breaking out, cutting and breaking equipment, such as pulverisers, road-saws, cut-off saws and the like are to be fitted with dust suppression kits or local exhaust ventilation (LEV) to collect/ suppress dust.
- Minimising drop heights for materials loading/ offloading.
- Adherence to any working hour restrictions that have been placed on the project.
- CR Reynolds Limited shall ensure that a temporary water supply is available on site from commencement of work, through to completion of snagging. Water shall be used for temporary welfare and for use during site operations, including dust suppression and dampening down.
- Where an existing mains water supply is not available, alternative measures shall be made to ensure a sufficient store of water is available for site activities (e.g., importing and storing water for onsite use in IBC's or similar) from commencement.
- CR Reynolds Limited shall hire mechanical sweeping equipment, as necessary, to dampen down dust and remove detritus from surrounding hard surfaces and reduce track-out.
- Plant and equipment for use on site will be hired from pre-approved suppliers.
- All plant on site shall conform to the highest standards of emissions.
- All fuels for use on site will be procured from a reputable supplier. All fuel on site will have the lowest sulphur content available at the time of purchase.
- Plant and equipment used on site will be operated by CPCS/ NPORS trained operators only.
- All plant and equipment shall be hired with evidence of a current Thorough Examination/ LOLER certificate from the hirer.
- Plant and equipment operators will undertake and record pre-use inspections, with any defects recorded and presented to the Site Manager for rectification.
- A quarantine arrangement for damaged or defective plant/ equipment on site shall be in place and controlled by the Site Manager.
- Stockpiles of dry spoil/ aggregates/ loose waste materials on site shall be temporarily sheeted over/ dampened down as necessary, particularly during windy/ dry conditions.
- Use of covered lockable skips on site (where available).
- Dampen down of hard surfaces as required during extended dry periods.
- Banksmen/ traffic marshals shall be on site to ensure that all loads entering/leaving site areas remain covered, and vehicle wheels checked and washed before exit (as appropriate).
- Site operatives (including CR Reynolds Limited and subcontractor operatives) will receive a site-specific induction which will include the control measures stipulated in this document. This will include, but will not be limited to:
  - Reporting of a dust/ fume concern
  - Onsite plant/equipment inspection and maintenance regimes.
  - Instruction on not to over-rev plant, or leave it idling unnecessary, generating unnecessary fume.
  - Adhering to site and surrounding national highway speed limits to reduce airborne dust disturbance from site vehicle and plant movements.
  - Use of dust suppression/ LEV/ dust capture technologies for plant/ equipment
  - Dampening down dry spoil/ aggregates and/ or covering as necessary to reduce wind-blown dust.
- RAMS briefings, daily site briefings and environmental toolbox talks shall be delivered to site operatives during the Construction Phase raising awareness of dust and air emissions on site, their effects, and the control measures in place on site.

<b>Mandatory minimum compliance action</b>	<b>Dust</b>
<ul style="list-style-type: none"> <li>• All subcontractor task RAMS are to be reviewed by the Site Manager or Construction Director, prior to their commencement of works on site and shall include measures to control dust from their site activities, as and where required.</li> <li>• Where Asbestos Containing Materials (ACMS) are present, these shall be removed in accordance with the Control of Asbestos Regulations 2012 and associated guidance, prior to any required demolition works commencing.</li> <li>• The Site Manager shall monitor current and forecast weather conditions, taking these into consideration when planning site work activities.</li> <li>• The burning of any waste, material, or other substance on site is prohibited in accordance with the site rules.</li> </ul>	

<b>Additional project-specific compliance action</b>	<b>Dust</b>
<ul style="list-style-type: none"> <li>• See above.</li> </ul>	

<b>Explanation of action</b>	<b>Dust</b>
<p>CR Reynolds Limited has a legal obligation to ensure that the release of dark smoke, grit, dust, and fumes is kept at an absolute minimum. It is important to consider the impact of CR Reynolds Limited operations upon our wildlife, neighbours, and the public, especially those in local accommodation, and using the public highway.</p> <p>CR Reynolds Limited has a legal responsibility to ensure that no asbestos is released into the atmosphere. Control of Asbestos Regulations 2012 place a duty on those responsible for premises, the duty holder, to take reasonable steps to find materials likely to contain asbestos. It is CR Reynolds Limited's responsibility to ensure that the risk or potential risk of any pollution incident is kept to an absolute minimum. All CR Reynolds Limited sites have the potential to cause a statutory nuisance, e.g., excavation and breaking out of hard surfaces. It is acknowledged as good practice to inform a Local Authority of the impending work if they have not been informed already.</p>	

<b>Person Responsible</b>	Site Manager	<b>Dust</b>
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<b>Checked/ Verified by</b>	Weekly and monthly site inspections, Internal auditing, EA/ Local Authority visits, and maintenance records.
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<b>Aspect</b>		<b>Litter</b>
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<b>Impacts upon</b>	<b>Client/ businesses/ wildlife</b>
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<b>Applicable Legislation</b>	<b>Duty/ Prohibition</b>
<b>Environmental Protection Act 1990 (Section 89(1) and (2))</b>  <b>EPA1990 (Sect. 59, 92A-92C)</b>  <b>Clean Neighbourhoods and Environment Act 2005</b>	<p>Landowners and occupiers to keep specified land clear of litter and refuse</p> <p>Principal litter authorities have the power to issue Litter Clearing Notices where land in their area is defaced by litter or refuse and this is detrimental to the amenity of the area. Litter Clearing Notices can be used to tackle litter on private land that can be blown or otherwise carried into neighbouring areas.</p> <p>A Local Authority can serve a notice requiring an owner to remove, at his own expense, accumulated waste for the purpose of keeping land</p>

<b>Town and Country Planning Act 1990</b>	free from rats and mice.
<b>Prevention of Damage by Pests Act 1949 (Sect 4)</b>	
<b>The Town and Country Planning (Environmental Impact Assessment) Regulations 2017</b>	Duty to carry out appropriate assessment to minimise environmental impact.
<b>The Habitats Regulations</b>	These regulations apply to the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. The Regulations provide these sites with protection through the designations of Special Areas of Conservation (SACs), which provide protection to a variety of special species and habitats, and Special Protection Areas (SPAs), which provide protection for rare and vulnerable birds and their habitats.

<b>Mandatory minimum compliance action</b>	<b>Litter</b>
<ul style="list-style-type: none"> <li>• Sites to provide waste disposal containers suitable to the type and quantity of waste produced.</li> <li>• Covered litterbins should also be provided as appropriate.</li> <li>• Site litter picks to be completed as required.</li> <li>• Waste disposal containers/ vehicles shall be covered during storage and transport to prevent contents escaping.</li> <li>• Regular informal and formal inspections/checks to monitor litter</li> <li>• Site surrounded by heras fencing to reduce risk of large elements of windblow litter being ejected from site.</li> </ul>	

<b>Additional project-specific compliance action</b>	<b>Litter</b>
<ul style="list-style-type: none"> <li>• Close bags, waste collection on regular basis</li> <li>• Provision of lockable skips (where available)</li> </ul>	

<b>Explanation of action</b>	<b>Litter</b>
<p>Under Section 34 of the Environmental Protection Act 1990 CR Reynolds Limited. has a duty of care to take reasonable measures to prevent escape of waste from his control.            The Clean Neighbourhoods and Environment Act 2005 requires businesses / occupiers to recognise their role in contributing to the quality and appearance of the local environment            Local Authorities can issue fines for non-compliance and recover costs should they need to remove waste.</p>	

<b>Person Responsible</b>	Site Manager	<b>Litter</b>
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<b>Checked / Verified by</b>	Weekly and monthly site inspections, internal audit, EA, Local Authority visits.
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<b>Aspect</b>	<b>Waste Disposal</b>
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<b>Impacts upon</b>	<b>Client/ businesses/ wildlife</b>
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<b>Applicable Legislation</b>	<b>Duty/ Prohibition</b>
<b>Environmental Protection Act 1990 – Part II</b>	Deals specifically with the prevention and minimisation of pollution of the environment or harm to human health by regulating the handling of waste.

	Section 33 prohibits the unauthorised deposit or treatment of controlled waste on land and prohibits companies from knowingly permitting the unauthorised deposit of controlled waste. Such sites require a waste management licence from the Environment Agency / SEPA / Local Authority.
<b>Environmental Protection Act 1990 – Part II – Section 34</b>	Provides a ‘cradle to grave’ Duty of Care on any person who produces, carries, keeps treats or disposes of controlled waste to ensure that it is transferred only to authorised persons. Measures must be taken to ensure that waste does not escape and that it is not disposed of illegally.
<b>Environmental Permitting Regulations 2016</b>	Prescribes the waste disposal and waste recovery operations (including certain waste storage, handling, and treatment operations) that require a waste management licence.
<b>Environmental Protection (Duty of Care) Regs 1991</b>	Sets out the documentation requirements to implement Section 34 of the Environmental Protection Act 1990.
<b>Control of Pollution Act 1974 (as amended)</b>	Deals specifically with the prevention / minimisation of pollution of the environment or harm to human health by regulating the handling of waste. Prescribes the registration of waste carriers and provides powers to help the Environment Agency to control the illegal dumping of waste.
<b>Controlled Waste Regulations 2012 (as amended)</b>	Defines and categorises controlled wastes for the purpose of the Environmental Protection Act 1990 Part II. The Regulations provide a definition of clinical waste and certain additional industrial wastes, including scrap metal, waste solvents and waste oil.
<b>Hazardous Waste Regulations 2005 (amended 2009/2016)</b>  <b>The Landfill (England and Wales) Regulations 2002 (as amended)</b>	<p>The Regulations introduce the requirements of the European Hazardous Waste Directive 91/689/EEC. The Regulation’s main aim is to define hazardous waste and to make sure it is properly managed and regulated.</p> <p><u>The Regulations:</u></p> <ul style="list-style-type: none"> <li>• Define hazardous waste</li> <li>• Require producers of hazardous waste to register their premises.</li> <li>• Restrict mixing and require separation of wastes where appropriate.</li> <li>• Make sure companies document the movement of hazardous waste.</li> <li>• Require consignees receiving hazardous waste keep thorough records and provide the Environment Agency with information on the disposal and recovery of hazardous waste.</li> </ul>
<b>Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)</b>	Regulations implement the Control of Pollution (Amendment) Act 1989. Together they require the registration of waste carriers of controlled waste and provide for the seizure of vehicles used for the illegal deposit of controlled waste. It is an offence to transport waste unless registered with the Environment Agency. There are a number of exemptions including the producer transporting his / her own waste to their disposal site.
<b>Clean Neighbourhoods and Environment Act 2005</b>  <b>Control of Pollution (Amendment) Act 1989</b>	<p><u>Current:</u></p> <p>Powers for statutory site waste management plans for construction and demolition projects Fixed penalty notices for failure to show Waste Transfer Note (£300) or waste carrier registration (£300).</p> <p><u>From April 2007:</u></p> <p>Powers for enforcement agencies to stop and search. Instantly seize vehicles used in fly-tipping Under Section 1 of the Control of Pollution (Amendment) Act 1989, it is an offence for anyone who is not a registered carrier to transport</p>

	controlled waste.
<b>The Town and Country Planning (Environmental Impact Assessment) Regulations 2017</b>	Duty to carry out appropriate assessment to minimise environmental impact.
<b>The Habitats Regulations</b>	These regulations relate to the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. The Regulations provide these sites with protection through the designations of Special Areas of Conservation (SACs), which provide protection to a variety of special species and habitats, and Special Protection Areas (SPAs), which provide protection for rare and vulnerable birds and their habitats.

<b>Mandatory minimum compliance action</b>	<b>Waste Disposal</b>
<p><b><u>Waste Storage:</u></b></p> <p>Waste shall be stored on site and appropriately, depending on type and classification, i.e., inert, non-hazardous, or hazardous waste. In any event, waste storage shall be kept to a minimum and in containers fit for purpose or locations for disposal. Where containers skips or bins are used, these will be marked up to clearly identify the contents, and covers and lids used, where available, to prevent the escape of the waste. Where possible, segregation of waste on site shall be applied to allow for efficient recycling.</p> <p><b><u>Waste Disposal:</u></b></p> <p>Duty of care shall be applied to all waste, and it shall therefore be ensured that all waste disposal is carried out by registered contractors and records of disposal controlled by Waste Transfer Notes and Consignment Notes. Waste disposal containers/ vehicles shall be covered during transport to prevent contents escaping. All waste will be kept securely stored in suitable containers.</p> <p>Ensure all waste that leaves site is accompanied by a Waste Transfer Note. The transfer note needs to include the following:</p> <ul style="list-style-type: none"> <li>• Description of the waste</li> <li>• European Waste Catalogue (EWC) six-digit code</li> <li>• Type of container</li> <li>• Quantity of waste</li> <li>• Names, signatures, addresses and licence numbers of transferor and transferee</li> <li>• Time and place of transfer</li> <li>• Type of transport and vehicle registration number</li> <li>• Location the waste is being transported to (not mandatory)</li> <li>• All Waste Transfer Notes for inert / non-hazardous waste must be kept for two years.</li> </ul> <p>CR Reynolds Limited shall ensure, as far as is reasonably practicable, that:</p> <ul style="list-style-type: none"> <li>• All waste is transferred to the authorised person</li> <li>• Obtain a copy of the transferee's Waste Carrier Licence, and a copy of the disposal points Waste Management Licence, Pollution Prevention Control (PPC) Permit, or relevant waste management exemption.</li> </ul> <p>It is essential that the full licence is sought, including the conditions attached to the licence.</p> <ul style="list-style-type: none"> <li>• A waste collection authority</li> <li>• The holder of a waste management licence or someone who is exempt from holding a licence</li> </ul>	

- A registered carrier of controlled waste

Waste management licences, PPC permits or exemptions for all waste contractors, employed by CR Reynolds Limited. should be checked for validity and that the licence covers the type and quantity of waste of which they are disposing.

Waste concrete, slurry or wash water from concrete or cement activities will not be discharged, intentionally or unintentionally, into any waterway/waterbody. Concrete and cement mixing and washing areas will be contained and sited at least 10metres from any water body or surface water drain.

### **Hazardous Waste**

All CR Reynolds Limited. sites producing hazardous waste must register with the Environment Agency as a producer in order to comply with the Hazardous Waste Regulations 2005. Where hazardous waste is identified, it shall only be stored following approved methods from the Environment Agency. Do not mix hazardous wastes or with inert or non-hazardous wastes.

Hazardous waste shall be controlled and disposed of following the Environment Agency approved procedures, and must be accompanied by a consignment note detailing the following:

- Premises code
- Description of the waste
- European Waste Catalogue (EWC) six-digit code
- Quantity of waste (kg)
- Container type, number, and size
- Physical form
- Hazard codes (H1 to H14)
- Chemical / biological components of the waste and their concentrations

Hazardous waste consignment notes must be retained for three years.

### **Implementing the Waste Hierarchy**

### **Waste Disposal**

All projects will implement the waste hierarchy:

**Eliminate > Reduce > Reuse > Recycle > Recover > Dispose**

Where waste is produced, it should be recycled unless this is not technically and economically feasible.

If disposal is the only option, then the Site Manager must select the disposal option that avoids or reduces impact on the environment.

CR Reynolds Limited will consider ways of reducing and managing waste as part of the site management process that includes:

- Minimising waste produced
- Recycling material where appropriate
- Identifying situations when waste can be sent back to the supplier
- Re-using waste/ redundant materials on site (where standards and good practice allows)

Additional project-specific compliance action	Waste Disposal
<ul style="list-style-type: none"> <li>The Site TM Plan will show waste storage arrangements for the project and must form part of the site induction.</li> <li>The Site Waste Management Plan will detail the waste produced on the project</li> <li>The project will compile and maintain a register of waste carriers' licenses and waste management licenses /PPC permits / exemptions associated with the disposal of waste from this project. This information will be detailed in the Waste Licenses Register and placed within in Appendix I.</li> <li>It has been instructed by the Client that all site waste materials associated with excavation are to be retained on site for future use by the Client.</li> </ul>	

Explanation of action	Waste Disposal
<p>It is a legal requirement that under the Environmental Protection Act 1990 all producers of waste, such as CR Reynolds Limited., ensure that waste is not disposed of on unauthorised land or other locations.</p> <p>Under EPA 1990 Part II CR Reynolds Limited. has a Duty of Care to take reasonable measures to: Prevent others from treating waste unlawfully or in a manner likely to cause pollution or harm to health.</p> <p>Prevent the escape of waste from their control and the control of others. To comply with the Duty of Care Regulations, CR Reynolds Limited., as a waste producer, must ensure that each shipment of waste is accompanied by a Waste Transfer Note detailing all the required information.</p> <p>As a hazardous waste producer CR Reynolds Limited. have a legal responsibility to ensure that their hazardous waste is disposed of legally under the Hazardous Waste Regulations. Under Section 34 of the Environmental Protection Act 1990 CR Reynolds Limited. has a Duty of Care to take reasonable measures to:</p> <ul style="list-style-type: none"> <li>Prevent any breach of the main fly-tipping offence (section 33)</li> <li>Prevent escape of waste from his control</li> <li>Document the transfer of waste (transfer or consignment note). Records kept for 2/3 years and be available for inspection if requested to do so.</li> </ul>	

<b>Person Responsible</b>	Site Manager	<b>Waste Disposal</b>
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<b>Checked / Verified by</b>	Weekly and monthly site inspections, internal audit, EA, Local Authority.
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<b>Aspect</b>	<b>Storage of Fuels, Oils and Chemicals</b>
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<b>Impacts upon</b>	<b>Land and Water Pollution/ Wildlife</b>
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Applicable Legislation	Duty/ Prohibition
<b>Control of Pollution (Oil Storage) (England) Regulations 2001</b>	Sets out the requirements for oil storage facilities for 200 litres plus of oil. All oil storage facilities must comply with the Regulations and follow the guidance provided by the Environment Agency.
<b>Environmental Protection Act 1990</b>	Persons contaminating land through their activities, which cause or may cause serious harm are liable for clean up under their terms of a remediation notice. Failure to comply with this notice is an offence.
<b>Environmental Protection Act 1990 (as amended by S.37 of the Environment</b>	Contaminated land is land which a Local Authority considers to be in such a condition due to substances in or under it that cause. Significant harm or there is a significant possibility of such harm being

Act 1995)	caused; or controlled waters are being polluted.
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017	Duty to carry out appropriate assessment to minimise environmental impact.
The Habitats Regulations	The regulations the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. The Regulations provide these sites with protection through the designations of Special Areas of Conservation (SACs), which provide protection to a variety of special species and habitats, and Special Protection Areas (SPAs), which provide protection for rare and vulnerable birds and their habitats.

<b>Mandatory minimum compliance action</b>	<b>Storage of Fuels, Oils and Chemicals</b>
--------------------------------------------	---------------------------------------------

- Waste generated from the project will be stored on site until such time that a licenced waste management subcontractor removes it.
- All fuels, oils and chemicals shall be stored in a site compound, in containers specifically manufactured for the purpose, to prevent contamination in the event of spillage or damage. Tank capacity shall be checked before delivery to prevent overfilling.
- Fuel tanks or bowsers must comply with the specifications set out in the regulations. All ancillary equipment (hoses, pistols, valves etc.) will be kept within secondary containment
- Tanks and bowsers must be lockable and kept locked when not in use.
- ‘Drums’ shall be stored with lids uppermost, and bungs inserted, to prevent leaking and contamination
- Containers must not be situated within 10m of any watercourse, and away from high-risk receptors such as drains, sampling points, sensitive habitats, and Sites of Special Scientific Interest (SSSI).
- Additionally, all local watercourses must be identified, and site drainage determined, these should be recorded / available on-site maps.
- Fuel stores will be equipped with bunds/drip trays and suitable spill kits.
- Diesel generators must be equipped with drip trays and suitable spill kits.
- Bunds/ secondary containment to be at least 110% capacity of the primary container(s)
- Drip trays must be emptied and cleaned on a regular basis.
- A licensed waste disposal contractor or the original supplier shall remove leaking or empty containers from site.
- Special care shall be taken when receiving and storing items such as oil, chemicals, cement, lime, and paints to prevent spillage and contamination.
- The contents of storage containers shall be clearly marked to prevent accidental cross contamination.
- A comprehensive library of Material Safety Data sheets and COSHH assessments shall be maintained on site, by the Site Manager to enable the safe use, handling, storage, and disposal of materials.
- Storage boxes/ cupboards should be lockable, and the site and stores secured out of normal working hours.
- CR Reynolds Limited. should take all necessary precautions to ensure that spillage or leakage of oils, diesel, petrol, and chemicals do not contaminate the ground and associated controlled waters including groundwater.
- COSHH assessments will address the handling requirements in response to spillage and disposal of all chemicals held on the project
- Arisings from earthworks shall only be stored in areas designated for the purpose and should be regularly inspected to ensure that no surrounding ground or watercourse is being contaminated by runoff, silt, or seepage.
- Each CR Reynolds Limited. site must have a refuelling procedure and the Site Manager or Works Supervisor will provide supervision.
- All fuel storage locations/ mechanisms must be inspected weekly and recorded.

<b>Additional project-specific compliance action</b>	<b>Storage of Fuels, Oils and Chemicals</b>
<ul style="list-style-type: none"> <li>• The Site TM Plan will show refuelling and storage arrangements for the project and will be communicated in the site induction.</li> <li>• Fuel, oil, and chemical storage arrangements must be made project specific to detail the anticipated requirements.</li> <li>• The ‘Project Refuelling Procedure’ must be made project specific according to requirements.</li> </ul>	

Explanation of action	Storage of Fuels, Oils and Chemicals
<p>It is an offence to store more than 200 litres of oil in a manner, which does not comply with the Regulations.</p> <p>The Environment Agency enforces these Regulations, if you have any concerns regarding your oil storage you can approach the Environment Agency for assistance and guidance. However, if you fail to act within a specified timescale the Environment Agency will serve a notice requiring that all oil storage be brought up to standard. Failure to comply with a notice is a criminal offence and will result in prosecution. This is to ensure that the least adverse impact is generated and that sensitive areas of the site are not damaged by indiscriminate dumping or storage. To minimise the risk of ground pollution and contamination and to ensure full compliance with the Control of Substances Hazardous to Health, the Control of Pollution Act, and the Environmental Protection Act. To minimise the risk of ground pollution and contamination and water pollution.</p>	

<b>Person Responsible</b>	Site Manager	<b>Storage of Fuels, Oils and Chemicals</b>
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<b>Checked / Verified by</b>	Weekly and monthly site inspections, internal audit, and plant/ equipment maintenance records.
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## CHAPTER 4 SITE PROCEDURES

See Appendix A for Site Procedures.

## CHAPTER 5 SCHEDULES OF ENVIRONMENTAL DUTIES

Duty	Frequency	Person Responsible
Monitoring any specified ecological protective measures	Daily	Site Manager
Monitoring of dust/ fume	Daily	Site Manager
Monitoring of odours	Daily	Site Manager
Monitoring of noise	Daily	Site Manager
Monitoring of vibration	Daily	Site Manager
Spillage/ run-off control	Continual	Site Manager
Control and management of excavated materials	Continual	Site Manager
External communication	As required	Site Manager
Control and review of CEMP	Continual	Site Manager/ SHEQ and IMS Coordinator

### 5.1 Environmental Incident Reporting

All environmental incidents/ loss events will be treated as a non-compliance and recorded on a Corrective Action Report. Lessons Learned Reports shall also be produced once all associated investigation works are complete. All environmental incidents will be dealt with following CR Reynolds Limited's IMS procedures. HS&E Accident Incident Report Form, once completed, will be retained in the Site SHEQ Files and Appendix F of this document.

## **5.2 Weekly Environmental Site Inspection Sheets**

Site Managers are responsible for ensuring that a weekly Environmental Site Inspection Sheet is completed and recorded. Completed inspections should be filed in the Site Manager's SHEQ Files. These shall be supplemented by formal site health, safety, and environmental inspections, undertaken monthly by our appointed consultants, Building Safety Group.

## **5.3 Site Waste Management Plan**

A Site Waste Management Plan will be produced prior to works starting and will be used to monitor and manage all waste on site.

## **5.4 Objective Recording and Monitoring Sheet**

Using the objectives in Section 1.4 of this document, the Site Manager will record and track environmental objectives. Completed forms will be filed in the Site Manager's SHEQ Files.

## **5.5 Spillage Response Plan**

See Appendix C for the Spillage Response Plan. Completed forms should be filed in the Supporting Documents Files.

## **5.6 Waste Transfer Notes**

All waste transfers will be recorded in a Waste Transfer Note, or Consignment Note. Waste Transfer Notes and consignment Notes will be kept for a minimum of 3 years. Completed forms should be filed in the Site Manager's SHEQ Files and Appendix E of this document.

## **5.7 Spill Register**

All spills will be entered into the Site Spill Register (Appendix D) and be retained in the Site SHEQ Files.

## **5.8 Dissemination of Environmental Plans and Training**

The Site Manager is to ensure that the existence of this document and its provisions are made well known to all personnel on site and any other interested stakeholders. Site inductions shall address environmental concerns, plus other training sessions as needed, including toolbox talks to raise awareness of the environmental issues affecting the site and how they are to be tackled. A written record will be kept of all toolbox talks and other briefings, containing the names of persons attending and the name of the person giving the talk.

Site specific rules will be written for this project which must be complied with. This requirement will be conveyed to the entire work force via the site induction with a copy of the site rules displayed in welfare for reference.

Toolbox talks are to be given on a regular basis and cover the operations that week and any Environmental TBTs are covered once a month. Prior to work commencing on site, operatives are given a briefing which covers all aspects for the particular task they are conducting, included in the briefing are site and task risks and environmental concerns (i.e., if the task involved an excavator the refuelling process would be covered). Current/ historic briefing registers are held in the site SHEQ Files.

**Table C: Project Environmental Toolbox Talks**

The programme of environmental toolbox talks for this project shall address the following topics:

<b>Toolbox Talk Topic</b>	<b>Target Audience</b>	<b>Frequency of Talk</b>
Dust And Fumes	CRR and subcontractor operatives	As required
Fuelling and Spill Management	CRR and subcontractor operatives	As required
Preventing Pollution	CRR and subcontractor operatives	As required
Managing Site Waste	CRR and subcontractor operatives	As required
Materials Storage	CRR and subcontractor operatives	As required
Noise and Vibration	CRR and subcontractor operatives	As required
COSHH	CRR and subcontractor operatives	As required

**CHAPTER 6 STATUTORY DOCUMENTS**

All statutory documents will be filed in the Site SHEQ Files.

**6.1 Mobile Plant Licence**

Details retained within site SHEQ Files for reference.

**6.2 Water Discharge Consent**

Details of consents from Client to be retained within site SHEQ Files for reference.

**6.3 Waste Carriers Licences**

Details retained within the Site Waste Management Plan for the project.

**6.4 Waste Disposal Facilities Licences**

Details retained within the Site Waste Management Plan

**APPENDIX A**  
**Site Procedures**

## SITE PROCEDURES

### PROCEDURE FOR SITE FUELLING

1. Site fuelling only to occur at designated area refuelling area.
2. Use of plant nappies when using/ stirring fuel powered plant/ equipment.
3. Consideration to be given to the proximity of watercourses and drains. No refuelling of plant to take place within 10m of an existing watercourses/ drains/ other sensitive receptor.
4. Gloves to be worn while refuelling.
5. Tank is to be locked at all times when refuelling is not occurring.
6. The key to the diesel tank will be held in the site office at all times. The diesel bowser operator will hold the key to the bowser at all times.
7. If diesel spill occurs, deploy spill kit beside static diesel tank to contain spill. Bund spillage to stop spill from reaching any nearby water course. Bowser operator to use spill kit kept in bowser.
8. Inform Works Supervisor/ Site Manager of spillage who will then record in spill register.
9. Managing Director to be informed as soon as possible (call: 01482 637373)
10. In the event that the spillage is not controlled then Environment Agency to be notified. Emergency contact number for the Environment Agency.

**APPENDIX B**  
**Site Objectives and Monitoring Form (recorded in Site SHEQ Files)**

## Site Objectives and Monitoring Form

**Contract Name & Number:** \_\_\_\_\_

**Site Manager:** \_\_\_\_\_

Project Environmental Objectives	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8
	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>	Yes/ No/ N/A <i>(If no explain measures to be taken)</i>
Is the site complying with all relevant environmental legislation?								
Is the site maintaining responsibility for ensuring the works are conducted in a way that minimises environmental impact and obstruction, siltation, or any other hindrance?								
Does the site continue to raise environmental awareness throughout the CR Reynolds Ltd.'s Project Delivery Team, including suppliers and subcontractors, by means of Site Inductions, regular Environmental Toolbox								

<p><b>Talks, briefings and through RAMS?</b></p>								
<p><b>Does the site continue to commit to achieve zero pollution incidents?</b></p>								
<p><b>Does the site continue to effectively implement the waste hierarchy?</b>  <i>(Eliminate/ reduce/ reuse/ recycle/ dispose appropriately)</i></p>								
<p><b>Have all statutory and non-statutory designates sites, listed buildings and protected flora, fauna and wildlife that may potentially be affected by CR Reynolds Ltd.'s activities been identified, and suitable protection measures implemented/ maintained?</b></p>								
<p><b>Are CR Reynolds Ltd working transparently and collaboratively with the Client's project and design team(s) and appointed subcontractors/ suppliers to ensure continuity of environmental awareness and project delivery?</b></p>								

**APPENDIX C**  
**Spillage Response Plan**

## **SPILLAGE RESPONSE PLAN**

**The contents of this spillage response plan shall be communicated during site induction and displayed on site/ ins site welfare for reference:**

- 1 In case of spillage of oils and chemicals report it immediately to Site Manager, who will report the incident to the Construction Director. The Construction Director will, if applicable, report the incident to the Environment Agency and, if necessary, the sewage undertaker.
- 2 Identify source of pollution and stop the flow immediately. Switch off sources of ignition.
- 3 Avoid spillage spreading – check drainage plan etc.
- 4 Deploy spill kit. Use absorbent materials if appropriate.
- 5 Do not wash spillage into drainage system.
- 6 Never use detergents.
- 7 If the spill has already entered the drains, block off the entrance to the drains.
- 8 Shovel contaminated sand/ earth/ granules into sacks or skips according to size. These will be disposed of appropriately.
- 9 Enter spill into spill register.
- 10 Fill out an Incident Report Form and send copy to the Managing Director
- 11 Replenish spill kit if necessary

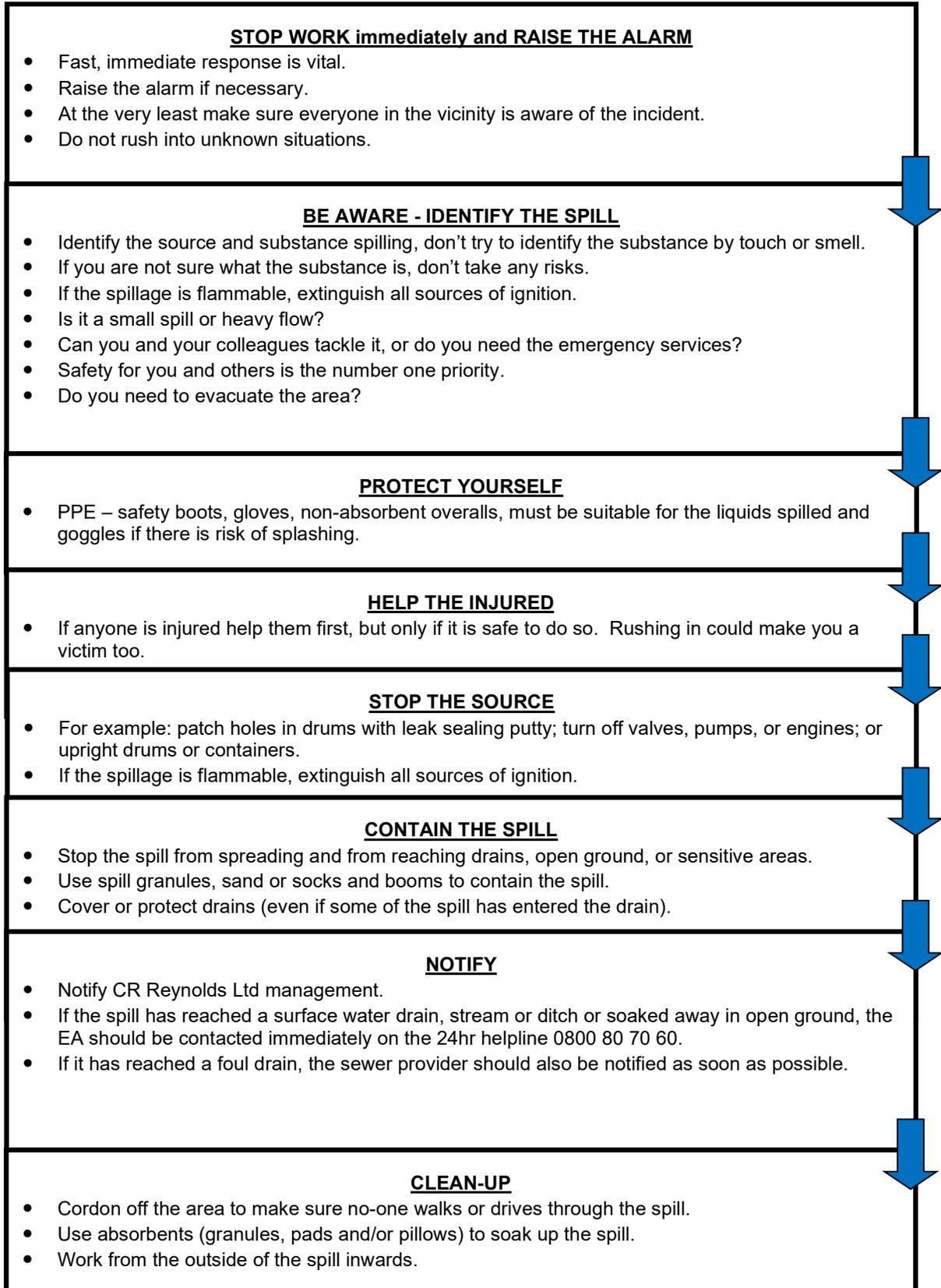
### **EMERGENCY NUMBERS:**

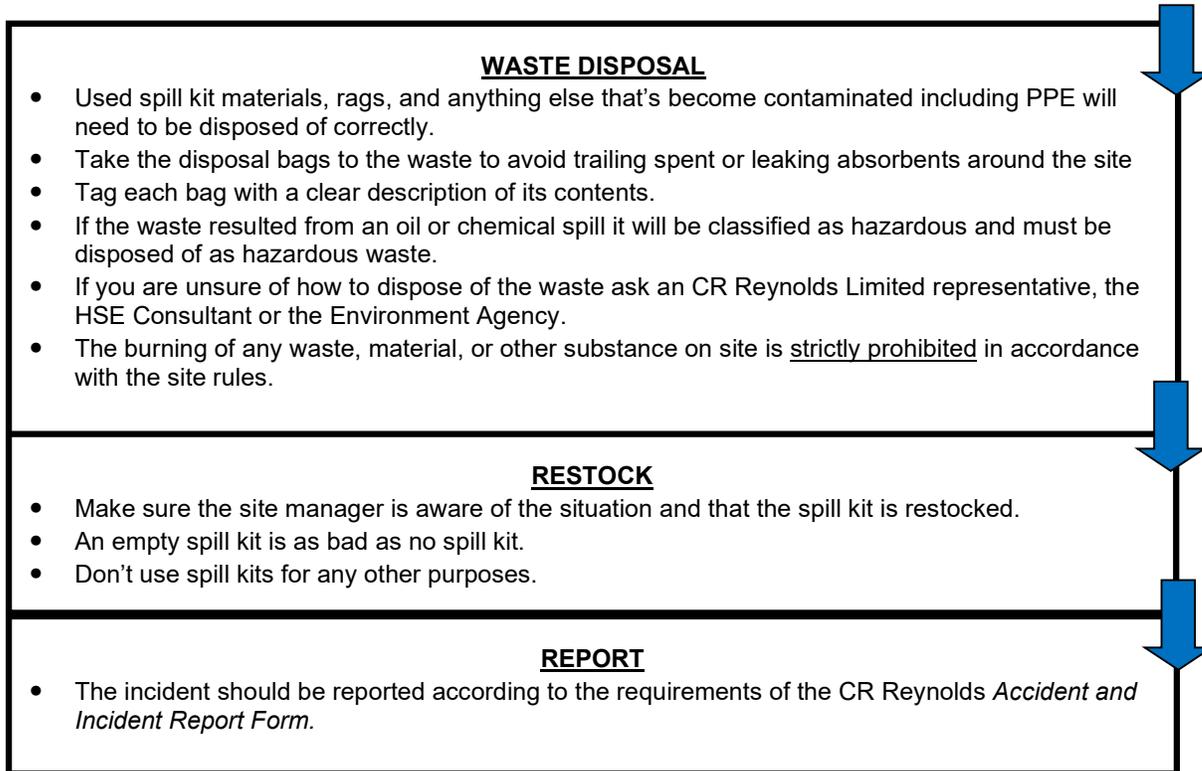
**CR Reynolds Head Office:** 01482 637373

**CR Reynolds Limited –**

- **Site Manager:** 07597457990
- **Contracts Manager:** 07967780880
- **Project Manager:** 07771816827
- **Operations Director:** 078965260010
  
- **Environment Agency Incident Hotline:** 0800 80 70 60
- **Environment Agency Floodline:** 0345 988 1188

**In the event of a leak or spillage on site:**





**Guidance on when the Environment Agency should be informed:**

Spillages of listed chemicals:

- Spillages of low hazard products with polluting potential (refer to Table 20 below).
- Hydrocarbon spillages (e.g., oil, biodegradable oil, paraffin, diesel, petrol) greater than 20litres.
- Incidents by/ near a watercourse.
- Incidents at Environment Agency identified “sensitive” areas/ receptors.
- Major incidents in combined drainage areas e.g., in stations.

At times there may be incidents that do not fall into any precise category, and if there is any doubt, the Environment Agency should always be contacted.

**Low Hazard Products with Polluting Potential – Circumstances requiring Environment Agency notification:**

Substance	Threshold	Example
Detergents	25 litres	Washing powder, washing up liquid, shampoo, soap, and car cleaning products
Disinfectants	25 litres	Household bleach, Dettol
Food stuffs	250 litres	Most have the potential to cause problems, especially sauces, sugars, salt, syrups, milk, yoghurt, and vinegar
Fertilisers	250 litres	All
Paints and dyes	25 litres	All
Inorganic powders	250 litres	Silt, Sand, Cement, Chalk, Gypsum/ Plaster
Organic liquids/ slurries	Varies	Sewage Sludge, Anti-freeze, Cutting lube, cooking oils, Glycerine, Alcohols, Latex and Soluble Polymers

The effects of these products vary. Some, such as detergents, are directly toxic to aquatic life. Silt and sand can cause the smothering and choking of aquatic life while others such as foodstuffs, drinks and blood can lead to deoxygenating of the watercourse. Others still may produce a combination of these effects. Every effort should be made to contain these products. The threshold values listed above are only a rough guide and in the event of any spillage advice is freely available from the Environment Agency.

At times there might be incidents that do not fall into any precise category, and if there is any doubt, the Environment Agency should always be contacted.

**APPENDIX D  
Spill Register**

## Spill Register

**Contract Number:** \_\_\_\_\_

**Site Manager:** \_\_\_\_\_

Incident Date	Location on Site	Pollutant Involved	Company Involved	Type: Gas/ Dust/ Fume/ Liquid	Pollution of - air/ land/ water/ other?  (please specify)	EA/ Other Authority Notified of Spillage  (Yes/ No/ N/A)	Describe Any Damage/ Disruption Caused	Corrective Action Taken to Prevent Reoccurrence

**APPENDIX E**  
**Waste Transfer Notes (copies recorded in Site SHEQ Files)**

**Project No:** \_\_\_\_\_

**WTN No:** \_\_\_\_\_

**SECTION A – DESCRIPTION OF WASTE**

1. Waste Classification:-
  
2. How is the waste contained?  
 Loose  Sacks  Skip  Drum  Other (describe)  \_\_\_\_\_
3. What is the quantity of waste (number of sacks, weight, etc.) \_\_\_\_\_

**SECTION B – CURRENT HOLDER OF THE WASTE (HOLDER)**

Producer of the Waste: _____	SIC code	
Location/address of the Collection: _____		
_____		
_____		

**SECTION C – PERSON COLLECTING THE WASTE (CARRIER)**

Name of Company: \_\_\_\_\_

Address of Company: \_\_\_\_\_

Registered Carrier No: \_\_\_\_\_ Expiry Date: \_\_\_\_\_

Issued by: \_\_\_\_\_

Validity Verified by: \_\_\_\_\_ Date: \_\_\_\_\_

*Vehicle Identification (if not identified on carriers notes):* \_\_\_\_\_

**SECTION D – WASTE DISPOSAL SITE**

1. Name and Address of Disposal Site: \_\_\_\_\_
  2. Disposal Site Licence No: \_\_\_\_\_
  3. Validity Verified by: \_\_\_\_\_ Date: \_\_\_\_\_
  4. Date of Transfer: \_\_\_\_\_ 5. Time of Transfer: \_\_\_\_\_
- (for multiple consignments give “between” dates): \_\_\_\_\_

**SECTION E - SIGNATURES**

	<b>Holder (Required)</b>	<b>Carrier (Required)</b>	<b>Disposal Site (Optional)</b>
Full Name (Block Capitals):	_____	_____	_____
Signature:	_____	_____	_____
Date:	_____	_____	_____

**ENGLAND AND WALES ONLY**

By signing below I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011

**Signed:** \_\_\_\_\_ **Position:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**APPENDIX F**  
**Accident/ Incident Reporting Form and Dust Emissions Complaint Form Templates**  
**(Copies recorded in Site SHEQ Files)**

**ACCIDENT/OCCUPATIONAL ILL-HEALTH ENVIRONMENTAL INCIDENT REPORT**

(To be forwarded to the SHEQ Coordinator and Managing Director within 24 hours of the incident occurring)

**1 Personal Details**

Ref: \_\_\_\_\_  Employee  Contractor/Visitor  
 Forename(s): \_\_\_\_\_ Surname: \_\_\_\_\_  
 Unit/Location: \_\_\_\_\_

**2 Incident Details**

Date:	_____	Time:	_____	Day of Week:	_____
Exact Location:	_____				
Lighting:	_____	Weather:	_____		
Ground Floor Conditions:	_____				
First Aid Given:	<input type="checkbox"/> Yes <input type="checkbox"/> No	By:	_____		
Sent to Hospital:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Time Detained:	_____		
Incident Details: (if ill-health, state when condition was identified)					
Nature of Injury:	_____				
Part of Body:	_____	Side:	_____		
Witnesses:	_____				
Incident Reported to:	_____	Time/Date:	_____		
Period of Absence:	_____				
Was a Vehicle Involved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Description:	_____		
Was a Machine/Tool Involved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Description:	_____		

**3 Railway Incident**

Railway Infrastructure Incident?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Track Walking:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Crossing Track?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Working?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Track Protection Details:	_____				
Have NR ISC been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Have NR site Representative been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No				

**4 Task Details**

Job Title:	_____	Job No:	_____
Work/Activity:	_____		
Are Site Health, Safety & Environmental Plans or Method Statements available?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Risk/COSHH Assessment Provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Task Training Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hazardous Substances Involved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Safety Data Sheet Available?	<input type="checkbox"/> Yes <input type="checkbox"/> No
PPE Used?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Working Alone?	<input type="checkbox"/> Yes <input type="checkbox"/> No
PPE Details:			
Additional Information:			

**5 Sub-Contractors**

Are Sub-Contractors involved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	(If no proceed to 6 Investigation)
Are Sub-contractors responsible for safety arrangements?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please detail		
Do we have Sub-contractors health & Safety documentation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Have their H&S documentation been reviewed by Project Manager?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Injured Person Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**6 Investigation**

Carried Out By: \_\_\_\_\_ Date: \_\_\_\_\_

Why did the Accident Occur?	
Action taken to prevent reoccurrence:	
Are changes required to the Site Health & Safety Plans or Method Statements?	<input type="checkbox"/> Yes <input type="checkbox"/> No

If yes, please detail

Are changes required to the IMS?

Yes  No

**7 Briefing Arrangements**

Have any changes to the IMS been briefed?

Yes  No

**8 Non-Conformances**

Have all non-conformances been recorded?

Yes  No

Have all non-conformances been closed out?

Yes  No

Please detail

**9 Close Out**

SHEQ Coordinator  
Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Director Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Site Dust/ Emissions Complaint Form**

<b>Complainant Contact Details</b>	
<b>Complainant Name -</b>	
<b>Address -</b>	
<b>Postcode -</b>	
<b>Complainant Contact Details -</b>	
<b>Tel -</b>	
<b>Email -</b>	
<b>Date -</b>	
<b>Complaint Ref Number -</b>	
<b>Complaint Details -</b>	
<b>Investigation Details</b>	
<b>Investigation carried out by -</b>	
<b>Position -</b>	
<b>Date and time investigation carried out -</b>	
<b>Weather conditions -</b>	
<b>Wind direction and speed -</b>	
<b>Investigation findings -</b>	
<b>Feedback given to Environment Agency and/ or local authority -</b>	
<b>Date feedback given -</b>	
<b>Feedback given to public -</b>	
<b>Date feedback given -</b>	
<b>Review and Improve</b>	
<b>Improvements needed to prevent a reoccurrence -</b>	
<b>Proposed date for completion of the improvements -</b>	
<b>Actual date for completion -</b>	
<b>If different insert reason for delay -</b>	
<b>Does the Construction Emissions Management Plan need updating? -</b>	
<b>Date that the dust management plan was updated -</b>	
<b>Closure</b>	
<b>Site Manager review date</b>	
<b>Site Manager signature to confirm no further action required</b>	

**APPENDIX G**  
**Weekly Environmental Inspection Sheets (copies recorded in Site SHEQ Files)**

<b>Project Title :-</b>	<b>Location :-</b>
<b>Inspected By :-</b>	<b>Date Of Inspection :-</b>

Inspection Items	Implemented?			Remarks (Specify location on site, good practices, problems observed, possible causes of Non Conformity and/or proposed corrective/preventive actions)
	Yes	No	N/A	
<b>1.0 AIR POLLUTION CONTROL</b>				
1.1 Is the construction site watered to minimise dust?				
1.2 Are large stockpiles of dusty materials covered or watered to prevent dust?				
1.3 Are cement de-bagging processes carried out in sheltered areas?				
1.4 Are all vehicles carrying dusty materials covered/watered over prior to leaving site?				
1.5 Are demolition work areas watered ( e.g. trimming activities by using breaker)?				
1.6 Are dusty roads paved and/or sprayed with water?				
1.7 Is dust controlled during percussive drilling or rock breaking activities?				
1.8 Are plant and equipment well maintained?- any black smoke observed?				
1.9 Is dark smoke controlled from plant?				
1.10 Are there enclosures around the main dust-generating activities?				
1.11 Is Hoarding provided along boundaries and properly maintained?				
1.12 Are speed control measures in place on site (e.g. speed limit signs)?				
1.13 Are there any other Air Pollution Issues? – Please Specify				
<b>2.0 WATER POLLUTION CONTROL</b>				
2.1 Are water discharge licenses required/in place?				
2.2 Are conditions of any license complied with? – check for monitoring records and observe physically				
2.3 Are waste water treatment systems being used and properly maintained on site?				
2.4 Are there any waste water discharges into storm drains? – is the waste water being treated?				
2.5 Are measures provided to properly direct effluent to silt removal facilities? – e.g. earth bunds				

2.6 Are U Channels and Manholes free from silt and sediment?				
2.7 Are sedimentation traps and tanks free from silt or sediment?				
2.8 Are all manholes on site covered and sealed?				
2.9 Are sandbags/earth bunds adopted to prevent washing away of sand/silt and waste water to drains, catch-pits, public roads, and footpaths				
2.10 Are vehicles and plant cleaned before leaving site, where necessary?				
2.11 Is the public road/area around the site entrance kept clean and free of muddy water?				
2.12 Is Domestic Water discharged to septic tanks or chemical toilets?				
2.13 Are there any other water pollution issues? Please specify				
<b>3.0 NOISE CONTROL</b>				
3.1 Is a Section 61 notice required? – If so, has it been obtained?				
3.2 Are the requirements of any Section 61 notice being adhered to?				
3.3 Do air compressors and generators operate with doors closed to minimise noise?				
3.4 Is plant and equipment turned off or throttled down when not in use?				
3.5 Do Air compressors and hand held breakers have valid noise assessments?				
3.6 Are any noise mitigation measures adopted? – e.g. noise barriers				
3.7 Is silenced equipment utilised?				
3.8 Are noise warning signs in place to warn others?				
3.9 Are there any other noise issues? – please specify				
<b>4.0 WASTE MANAGEMENT</b>				
4.1 Is the site kept clean and tidy? E.g. litter free, good housekeeping?				
4.2 Are separate areas designated for inert and non inert wastes?				
4.3 Are separate labelled containers/areas provided for facilitating recycling and waste segregation?				
4.4 Are construction wastes/recyclable waste and general refuse removed off site regularly?				
4.5 Are construction wastes collected and disposed of properly by licensed waste carriers?				

4.6 Are chemical waste products collected and disposed of by licensed carriers?				
4.7 Are chemical; wastes properly stored and labelled on site?				
4.8 Are oil drums and plant/equipment provided with drip trays?				
4.9 Are drip trays free from oil and water?				
4.10 Is there any oil spillage?				
4.11 Is litter, foam, or other objectionable waste in nearby water drains/sewers?				
4.12 Are asbestos wastes handled by registered competent professionals?				
4.13 Are Spill kits available on site?				
4.14 Are there any other waste management issues? – please specify				
<b>5.0 STORAGE OF CHEMICALS OR DANGEROUS GOODS</b>				
5.1 Are chemicals stored and labelled correctly?				
5.2 Does storage of dangerous goods comply with license conditions? – check for dangerous goods storage license				
5.3 Are proper measures in place to control oil spillage during plant maintenance or to control chemical spillage? – e.g. drip trays				
5.4 Are spill kits/sand/saw dust used for absorbing chemical spillage readily available on site?				
5.5 Are there any other Chemical/Dangerous Goods Issues? - Please Specify				
<b>6.0 PROTECTION OF FLORA, FAUNA, AND HISTORIC HERITAGE</b>				
6.1 Is disturbances to flora minimised?				
6.2 Is disturbance to fauna minimised?				
6.3 Is there any historical Heritage on site/ - if yes are appropriate measures in place to protect during construction works?				
6.4 Are there any other issues relative to protection of flora, fauna, and historic heritage?				
<b>7.0 RESOURCE CONSERVATION</b>				
7.1 Is water recycled wherever possible for dust suppression?				
7.2 Is water pipe leakage and wastage prevented?				
7.3 Are Diesel powered plant and equipment shut off whilst not in use?				

7.4 Are energy conservation practices adopted?				
7.5 Are metal or other alternatives used to minimise the use of timber?				
7.6 Are materials stored in good condition to prevent deterioration and wastage?				
7.7 Are there any other Issues? – if so please specify				
<b>8.0 EMERGENCY PREPAREDNESS AND RESPONSE</b>				
8.1 Are fire extinguishers/firefighting facilities on site properly maintained and not expired?				
8.2 Are accidents and Incidents reported and reviewed, with corrective or preventive actions recorded and instigated?				
8.3 Are Emergency Environmental Contacts detailed in the Method Statement/Work Package Plan?				
8.4 Are there any other issues with respect to Emergency Preparedness and Response?				

ANY ITEMS MARKED “NO”, WHERE REMEDIAL ACTION CANNOT BE INSTIGATED IMMEDIATELY AND EFFECTIVELY ON SITE SHALL BE RAISED AS A CORRECTIVE ACTION REPORT BY THE AUDITOR WITH ACTIONS AGREED TO DEFINED TIMESCALES – THESE WILL BE MONITORED AT REVIEW MEETINGS UNTIL SATISFACTORY CLOSE OUT.

NAME OF SITE MANAGER..... SIGNATURE OF SITEMANAGER.....DATE.....

**APPENDIX H  
Waste Disposal Facilities Licences (copies recorded in Site SHEQ Files)**

**APPENDIX I**  
**Waste Carriers Licences (copies recorded in Site SHEQ Files)**

## Certificate of Registration under the Waste (England and Wales) Regulations 2011

### Regulation authority

Name	 Environment Agency
Address	National Customer Contact Centre 99 Parkway Avenue Sheffield S9 4WF
Telephone number	03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

### Carriers details

Name of registered carrier	C.R. REYNOLDS LIMITED
Registered as	An upper tier waste carrier, broker and dealer
Registration number	CBDU484158
Address of place of business	C R REYNOLDS LTD REDCLIFF COURT REDCLIFF ROAD HESSLE HU13 0EY
Telephone number	01482 637372
Date of registration	9 May 2023
Expiry date of registration (unless revoked)	9 May 2026

This certificate was created on 27 June 2023. These details are correct at the time of certificate generation.

### Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.

You can do this by calling the Environment Agency.

**APPENDIX J**  
**Water Discharge Authorisations (copies recorded in Site SHEQ Files)**