Construction (Environmental) Management Plan (CEMP)

CUMMINS HUDDERSFIELD BRIDGE PROJECT

Client:

Cummins Turbo Technologies

CEMP Reference: CML/224.11657/CEMP/001 Rev 02

Date: 12th November 2025

Report Issue

Project Name/Report Title: Construction (Environmental) Management Plan (C(E)MP)

Site Name: Cummins Huddersfield Pedestrian Footbridge

CEMP Document Reference: CML/224.11657/CEMP/001 Rev 02

Report Rev.	Issue Date	Written by	Check & Approval by	Comments
01	25/09/2025	A Alammari Design Manager	J Thomas Engineering Manager	Initial issue
02	12/11/2025	Ian Dimmock Project Manager		Updated dates, duty holders, appendices, and programme references to reflect current project status (post-tender award, pre-site start). Incorporated latest drawings and AIP details for accuracy. Reviewed for regulatory updates (no major changes since Rev 01).

CEMP Document Control:

Revision History

Revision No.	Issue Date	Author	Reason for Revision
01	25/09/2025	A Alammari Design Manager	Initial issue
02	12/11/2025	I Dimmock Project Manager	Periodic Review

This Revision

Role	Name	Position
Checked by	J Thomas	Engineering Manager
Approved by	J Thomas	Engineering Manager

[1] This CEMP will be monitored on a regular basis to ensure that work is progressing according to its content and will be updated/amended to record details of any changes to its content and justifications for these changes.

Contents

1. INTRODUCTION

1.1 Background

This Construction (Environmental) Management Plan (CEMP) outlines the environmental and management strategies for the construction of the new pedestrian footbridge across St Andrews Road at the Cummins Turbo Technologies site in Huddersfield. This project is necessitated by the need to enhance safety for employees, visitors, and contractors who currently must cross a busy road to move between buildings. Recent incidents, including serious accidents, have emphasized the urgency for this safe crossing solution. The footbridge aims to provide a secure, environmentally responsible, and efficient means of traversing St Andrews Road, significantly reducing the risk of accidents. As of November 12, 2025, the project has progressed through tender review and contract award, with site mobilisation scheduled for December 8, 2025 (refer to Appendix B – Construction Programme Rev04)."

1.2 Aims & Objectives

The aim of this CEMP is to outline how the development works will avoid, minimise, or mitigate impacts on the environment within their defined work locations along with the surrounding local area. This CEMP includes:

- Details of the project management structure, roles and responsibilities with regard to managing and reporting on the environmental impact of the construction phase.
- Programme of Works.
- Description of Works to include site preparation, enabling & groundworks, access and highway works, drainage, foundation and buildings, landscaping and utilities.
- Construction plant & machinery.
- Hours of construction work.
- Integration with latest design approvals, including Approval in Principle (AIP) for Design.

The key objectives of this CEMP include, but are not limited to:

- Defining key stakeholder roles and responsibilities.
- Conforming with applicable environmental legislation and other statutory requirements.
- Describing the operational controls for each of the identified environmental aspects.
- Ensuring that any adverse environmental impacts are avoided, minimised, or mitigated.

The scope of this CEMP will cover the following environmental aspects that are considered applicable to this project: Air quality (dust & particulate matter), Noise & vibration, Artificial lighting, Waste, and Pollution prevention.

1.3 Planning Policy, Consent & Regulatory Framework

This CEMP follows recognised best practice for environmental management during construction.
The guidance and standards referenced include:

- Section 61 of the Control of Pollution Act 1974
- Institute of Air Quality Management guidance on dust, construction air quality, and monitoring around active construction sites
- BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites
- BS 7385-2:1993 Evaluation and measurement of vibration in buildings
- BS 6472-1:2008 Assessment of human exposure to vibration in buildings
- Relevant CIRIA and BRE practice notes

2. SITE INFORMATION & PROJECT DETAILS

The development site sits within the Cummins Turbo Technologies facility in the Metropolitan Borough of Kirklees, Huddersfield. St Andrews Road (HD1 6RA) runs between the two main parts of the site. The National Grid Reference is SE 15072 16970.

Cummins operates several buildings on both sides of St Andrews Road. The proposed footbridge will provide a safe pedestrian connection between these buildings, removing the need for at-grade road crossings. The wider site includes office areas, manufacturing space, and large parking zones.

Primary access is from St Andrews Road, supported by additional routes used for emergency, service, and delivery vehicles. These access points maintain safe vehicle movements around the operational site.

A detailed Site Location Map & Planning Boundary showing the exact position of the proposed footbridge, adjacent buildings, and other relevant site features is included in Appendix A – Drawings.

2.1 Surrounding Land Use

The Cummins site on St Andrews Road is primarily surrounded by a mixture of industrial and commercial properties. This includes other manufacturing and engineering facilities, which form a significant part of the local industrial landscape, characteristic of this sector of Huddersfield.

To the east, the area gradually transitions into residential zones. These are interspersed with commercial establishments, providing essential services and amenities to the local population, thus supporting the area's mixed-use character.

South of the site lies a predominantly residential neighborhood. This area provides housing for many who work in the industrial and commercial sectors along St Andrews Road.

West of the site, the land use continues to be industrial and commercial.

2.2 Environmental Site Setting

A review of the Environment Agency's Flood Risk Map indicates that the proposed site for the Cummins Huddersfield Pedestrian Footbridge is within Flood Zone 2, which suggests a medium probability of flooding. An extract from the Environment Agency Flood Zone Risk Map is presented in Figure 1 below.

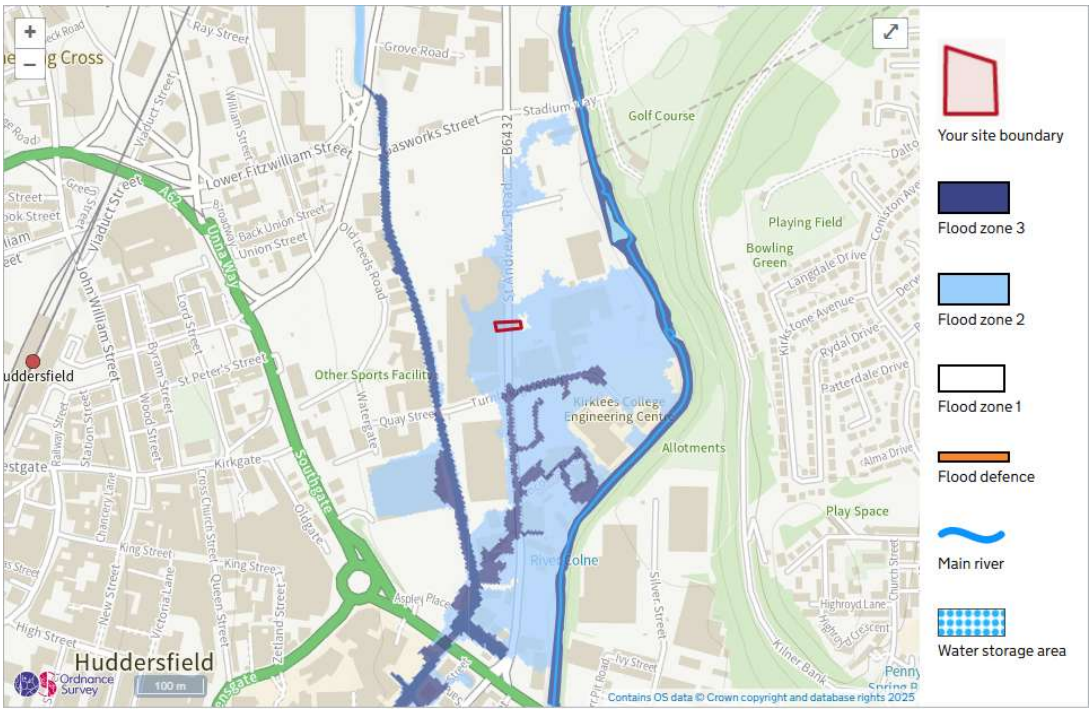

Figure 1: Environment Agency Flood Risk Map Extract

2.3 Proposed Development

The approved planning application for the Cummins Huddersfield site pertains to the construction of a pedestrian footbridge. This bridge is designed to enhance connectivity and safety for employees traversing between the east and west sections of the Cummins Turbo Technologies premises, crossing over St Andrews Road. The specifics of the project include the installation of stair and lift towers at both ends of the bridge to ensure accessibility for all users.

In addition to the main bridge structure, the project includes associated alterations such as landscaping in the visitor car park area and modifications to existing building entrances to integrate seamlessly with the new bridge access points.

The plan also incorporates essential safety and security measures including the erection of security barriers and adequate lighting along the bridge and its approaches to ensure user safety at all times.

Details of the project's layout, including the positioning of the bridge, stair and lift towers, and associated works are detailed in the Development Layout Plan, provided in Appendix A. This plan has been developed to minimize disruption to the existing site operations during construction while ensuring full functionality upon completion.

3. DUTY HOLDERS

3.1 Client & Developer

Table 1 details the contact information of the Client and Developer for this project.

Table 1: Client & Developer Details

Name	Position	Address	Contact Number	Email
Gareth Cooper Cummins	Cummins Huddersfield Facilities Leader	Cummins Turbo Technologies St Andrews Road, Huddersfield, HD1 6RA	07786975800	gareth.cooper@cummins.com

3.2 Principal Contractor

Table 2 details the contact information for the key staff involved in the development of the site.

Table 2: Principal Contractor

Name	Position	Address	Contact Number	Email
J Thomas Construction Marine Ltd	Engineering Manager	CML The Coach House Chapel Allerton Leeds, LS7 4FE	07921 387505	j.thomas@cml.uk.com

3.3 Contractor Administrator – Cummins Turbo Technologies

Table 4 details the contact information for the contract administrator involved in the development of the site. These details will be updated in future to reflect changes.

Table 4: Contract Administrator Contact Details

Name	Position	Address	Telephone Number	Email Address
Gareth Cooper Cummins	Huddersfield Facilities Manager	Cummins Turbo Technologies St Andrews Road, Huddersfield, HD1 6RA	07786975800	gareth.cooper@cummins.com

4. ROLES AND RESPONSIBILITIES

4.1 Client & Developer

The Client/Developer is responsible for ensuring environmental management is embedded across the construction works. Key duties include:

- Ensuring the CEMP is prepared and approved before construction begins, as required by the planning consent
- Appointing a Principal Contractor to manage the works and implement this CEMP, including the co-ordination of all subcontractors
- Issuing the CEMP to the Principal Contractor and reviewing any comments or updates needed before implementation
- Working with the Principal Contractor to review and refine the CEMP as the project progresses to keep responsibilities clear and current
- Submitting the CEMP to the Local Planning Authority to discharge the relevant planning condition.

4.2 Principal Contractor

Principal Contractor is responsible for managing the works in line with this CEMP and ensuring that environmental controls are in place throughout construction. Key duties include:

- Reviewing the CEMP before construction begins and providing any required feedback
- Implementing the CEMP on site and ensuring the current version is available to all operatives
- Identifying significant environmental aspects and making sure all planning requirements are addressed before work starts
- Putting in place the controls needed to minimise noise, dust, vibration, pollution, waste and other environmental risks, including resources for incident response
- Managing site access so that operatives and visitors avoid environmental hazards and understand emergency arrangements
- Updating the CEMP as the works progress and ensuring site teams are aware of any changes
- Providing induction, briefings and training so employees, subcontractors and visitors understand the CEMP and comply with it

• Ensuring compliance with all relevant environmental legislation and confirming subcontractor competence before work begins
• Carrying out regular inspections and audits to confirm compliance with this CEMP and legal requirements
• Recording, investigating and reporting environmental incidents and near misses
• Acting as the first point of contact for public enquiries and logging complaints, non-conformances and corrective actions

4.3 Key Contractors

All key contractors and site operatives on the site must conform to the arrangements they have been shown in respect of the CEMP. Site operatives are also responsible for:

• Implementing all control measures relevant to their work activities
• Complying with environmental legislation that applies to the tasks they carry out
• Ensuring their activities do not cause pollution, harm health, or negatively impact local amenity
• Informing the Principal Contractor of any non-conformance with the CEMP or its control measures
• Reporting any environmental hazards or incidents that pose an immediate risk to people or the environment.

4.4 Information for Contractors & Visitors

All contractors and visitors to the site will be made aware of the CEMP and the controls applicable to their presence and activities on site including but not limited to:

- Method statements
- Site induction
- Environment briefings
- Toolbox talks

The Principal Contractor's site management team will monitor all communication between project parties to ensure environmental matters are identified, discussed, and properly managed. Observations, actions and decisions will be recorded in meeting minutes or issued by email where required. All relevant correspondence will be retained on site.

Relevant site layout and location plans/development drawings detailing the location and construction of the site compound, storage locations and car parking are to be displayed on an information board at either the site entrance or main site office.

5. CONTRACT WORKS & CONSTRUCTION PROGRAMME

5.1 Contract Works

This section summarises the construction activities required to deliver the Cummins Huddersfield Footbridge. The key elements of the works are:

Excavation and Foundations: Excavations will be carried out to form the west and east abutments, including the lift pit on the east side. Foundations will be constructed using 450 mm diameter SFA piles with a 1.50 m rock socket, in line with the approved Van Elle design package. Reinforced concrete pile caps and foundation slabs will be formed to the levels shown on the Matrix CE drawings.

Temporary Construction Access: Temporary access arrangements will be established on St Andrews Road to support safe delivery of plant, materials and the bridge span. These will be coordinated with Cummins operations to avoid disruption to site traffic.

Bridge Construction: The main steel span, approximately 40 metres long, will be installed using a mobile crane positioned on agreed crane mats. Stair and lift towers will be constructed on each side of the road to provide full accessibility.

Service Installations: Lighting, power and communication systems will be installed to meet operational and security requirements. Cable routes will be coordinated with Cummins to avoid existing services.

Hard Standing Areas: Temporary hardstanding and storage areas will be established near both abutments for safe handling of materials, reinforcement and formwork.

Landscaping and Security Features: On completion of the structural works, local soft landscaping will be reinstated and security fencing and access control measures will be installed around the new structures.

Lighting Installation: New lighting will be installed along the bridge and its approaches to provide safe access during hours of darkness.

The layout of the works, including bridge location, access routes and compound areas, is shown in the drawings listed in Appendix A.

5.2 Construction Programme

A construction programme is provided in Appendix B. This programme will be updated as the project progresses, and the CEMP will be revised to reflect any changes to the sequence or duration of works.

6. ENVIRONMENTAL ASPECTS, IMPACTS & CONTROLS

6.1 Introduction

This section identifies the environmental aspects and potential impacts associated with the construction of the footbridge.

For each significant aspect, this CEMP sets out the controls that will be applied to minimise environmental risk and protect human health, local amenity and the surrounding operational Cummins site.

6.2 Air Quality: Dust & Particulate Emissions

Aspect:

Construction activities may generate dust and airborne particulates. The main sources include:

- Deliveries and construction plant movements
- Excavation and foundation works
- Handling, loading and exporting soils
- Exposed earth during dry or windy conditions
- Concrete cutting and similar operations

Impacts:

Receptors prone to dust and particulate matter impacts include:

- Site personnel and nearby workers exposed through inhalation or eye contact
- Local buildings, vehicles and infrastructure subject to dust deposition

Mitigation Controls:

The potential to generate dust and particulate matter will be minimised through the implementation of the following Best Available Techniques (BAT) and Best Practical Means (BPM) measures.

Dust – Groundworks

- Dampen exposed soils and stockpiles when required
- Locate stockpiles away from sensitive receptors where possible
- Minimise stockpile surface areas and maintain stable batters
- Keep material drop heights low
- Use windbreaks or screening where beneficial

Dust – Excavation Operations

- Use water suppression during excavation, cutting and concrete works
- Ensure cutting equipment includes integrated dust suppression
- Carry out cutting tasks in designated areas

- Use enclosed chutes, covered skips and sealed containers for waste
- Any screening or crushing will only be undertaken by a contractor operating under the correct Part B Environmental Permit and in line with PG 3/16 (04)

Dust – General Activities

- Regular visual inspections of work areas, access routes and adjacent roads
- Maintain plant and equipment in good working order
- Use dust-suppressed tools
- Burning of materials is strictly prohibited

Dust – Construction Traffic

- Damp down site access routes as required
- Inspect nearby highways regularly and deploy road sweepers as needed
- Sheet all vehicles transporting loose or dry materials
- If required, a wheel-cleaning area will be used at the site exit point, including a rumble strip and jet wash with water collected in a sump for off-site disposal
- Construction traffic will avoid sensitive routes and comply with a 5 mph site speed limit

Particulate Matter – Fumes

- No unnecessary idling of engines
- Use ultra-low sulphur diesel where diesel plant is required
- Keep plant and vehicles well maintained and compliant with MOT and emissions standards
- Use electric or low-emission plant where possible
- Inspect plant for excessive smoke; faulty equipment will be taken out of service until repaired.

6.3 Noise & Vibration

Aspect:

Noise and vibration will arise from general construction activities. Key sources include:

- Construction traffic
- Movement of plant and materials
- Excavation and concreting operations
- Steel assembly and installation
- Drilling and piling activities
- Main span installation

Impacts:

Noise is any unwanted sound that may cause annoyance or disturbance. Excessive or repetitive noise can impact health, concentration and local amenity.

Under English law, noise may constitute a nuisance where it interferes with the reasonable use or enjoyment of land.

Ground-borne vibration can cause disturbance to nearby receptors. At high levels it may affect structures or sensitive equipment.

Mitigation Controls:

Noise and vibration will be controlled using Best Practicable Means (BPM) in line with the Control of Pollution Act 1974 and BS 5228. Controls will be applied proportionately to higher-risk activities such as piling, steel erection and the main span lift.

Core Working Hours

- Monday–Friday: 07:30–18:00
- Saturday: 08:00–18:00
- Sunday/Bank Holidays: No audible works

Workforce may arrive up to 30 minutes before start time but must minimise early-morning noise such as idling engines or reversing alarms.

Out-of-Hours Working / Night Operations

- Any out-of-hours activity requires a Section 61 prior consent from Kirklees Council.
- A night-time road closure will be required for installation of the main span.
- The planned lift window is 8 April 2026, approximately 20:00–06:00, with an applied-for closure period covering five nights from 6 April 2026 to provide contingency.
- Works will involve crane setup, rigging and controlled lifting.
- Residents and nearby businesses will be notified 14 days in advance through a letter drop.

Noise – Traffic Movements

All site traffic will follow the approved Traffic Management Plan, which will be finalised before mobilisation and displayed at the site entrance. The plan covers routing, signage, and banksman arrangements.

Control	Mitigation Measures
Routing & Scheduling	• Deliveries programmed during core hours only • No deliveries during the main span night lift • HGVs routed via agreed access points to avoid sensitive receivers
On-Site Management	• Maintain haul routes through daily inspection and repair • 5 mph site speed limit • Banksman used for reversing • Engines switched off while unloading • No unnecessary idling
Monitoring	• Regular checks along site boundaries • Daily log of HGV movements

Noise – Mobile Plant Movements

Mobile plant will meet relevant noise emission regulations and will be operated using Best Practicable Means in line with BS 5228.

Control	Mitigation Measures
Selection & Operation	• Use quieter, well-maintained plant wherever possible • Use tracked plant on hard surfaces • Switch off engines when not in use.
Silencing & Sequencing	• Fit compressors, pumps and similar equipment with acoustic covers • Use mufflers or silencers on pneumatic tools • Avoid running multiple noisy items of plant in close proximity • During night works (main span lift), use silenced plant and minimise rigging noise
Maintenance & Alarms	• Daily checks on plant condition and acoustic covers • Broadband (white-noise) reversing alarms on all plant • Remove or repair any plant generating excessive noise

Noise – Excavation Operations

Excavation for abutments and piling platforms will follow Best Practicable Means under BS 5228 and will take place within core hours.

Control	Mitigation Measures
Plant & Operation	• Use quieter tracked excavators and maintain acoustic covers • Keep drop heights low when loading vehicles • Switch off engines during longer pauses • Use mains-powered pumps where possible
Vibration & Sequencing	• Plan works to limit duration in any one area • Avoid unnecessary simultaneous operation of plant • Monitor on-site activities and adjust sequencing if noise rises above expected levels
Maintenance	• Ensure all plant is fully maintained and free from faulty or excessively noisy parts

6.3 Artificial Lighting

Temporary lighting will be required during limited periods of night-time work. All lighting will be designed and positioned to minimise sky glow, glare and light spill in line with ILP Guidance GN01/21 and BS EN 12464-2. The nearest sensitive receptors are residential properties to the east and south.

Key Requirements:

- Temporary lighting will be needed for the main span lift, which will take place overnight under a programmed road closure.
- At all other times, lighting will be short-duration and task-specific, such as early-morning or late-afternoon winter works.
- Temporary lights will be removed as soon as the task is complete and not left running unnecessarily.

Temporary Lighting Controls:

Control	Measures
Types & Positioning	• Use low-level, shielded task lighting such as balloon lights, small tower units or vehicle-mounted LEDs • Direct lighting towards the work area only and avoid upward spill • Position lighting so far as practicable away from the eastern and southern boundaries • Fit louvres or hoods to reduce glare and prevent light break-out
Limit Trespass/Glare/Sky Glow	• Keep light levels as low as reasonably practicable • Avoid tall floodlights and wide-beam units • Ensure vehicle lighting is compliant, downward-focused and well maintained
Operational	• Use timers or motion activation so lights only operate when required • Switch off lighting immediately once tasks are complete • Provide advance notification to nearby residents ahead of the night-time span installation works
Ecology	• Maintain darker corridors along landscaped edges where possible • Use warm-white lighting (3000K or below) to reduce ecological disturbance

6.4 Waste Emissions

This section outlines the approach to managing and minimising waste generated during construction of the footbridge.

Waste Hierarchy: The Waste (England and Wales) Regulations 2011 require the waste hierarchy to be followed in the order of priority:

Prevention → Preparing for Re-use → Recycling → Recovery → Disposal.

All waste transfers will document how the hierarchy has been applied.

Figure 3: The Waste Hierarchy

General Principles: Waste will be reduced as far as reasonably practicable. Anticipated construction waste includes:

- Excavated soils
- Concrete and reinforcement offcuts
- Steel offcuts and packaging
- General construction waste

Waste will be segregated in designated skips within the site compound. Only licensed waste carriers and treatment facilities will be used, with records retained by the Principal Contractor.

Prevention & Reduction: Preventing waste is the priority. Measures include:

- Accurate material take-offs to avoid over-ordering
- Just-in-time deliveries for steel and concrete
- Secure, weather-protected storage to prevent material damage
- Clear RAMS and toolbox talks to promote careful handling and reduce breakage.

Preparing for Re-use: Materials that cannot be prevented will be assessed for re-use on or off site, including:

- Timber formwork and pallets
- Reusable protection materials
- Packaging suitable for return or reprocessing

Excavated soils will be reused on site where suitable for backfilling or landscaping; any unsuitable material will be segregated for removal.

Recycling: Where re-use is not possible, recyclable waste will be separated at source:

- Metals – segregated for 100 percent recycling
- Concrete and inert materials – sent to an approved aggregate recovery processor where feasible
- Plastics, cardboard and paper – placed in dedicated recycling bins
- Mixed recyclables – sorted by a licensed recycling facility

Recovery & Disposal: Only residual waste that cannot be reused or recycled will be sent for recovery or, where necessary, disposal at a permitted facility. No waste will be burned on site.

Duty of Care: The Principal Contractor will maintain a register of all waste carriers, transfer stations and recycling facilities, including:

- Company details and permit/licence numbers
- Expiry dates and relevant waste codes
- Copies of waste transfer notes (retained for a minimum of two years)
- Regular checks will be carried out to confirm compliance.

Monitoring & Reporting: Waste and recycling performance will be monitored through routine site inspections and monthly reports to the Client. Toolbox talks will be updated if performance trends show a need for improvement.

6.5 Traffic & Transport

Aspects & Impacts

Traffic and transport activities have the potential to create environmental impacts including:

- Noise from vehicle movements
- Dust from construction traffic
- Local congestion
- Risks to pedestrian and cyclist safety

Mitigation Controls

All traffic movements will comply with the approved Traffic Management Plan (TMP), which will be finalised prior to mobilisation and displayed at the site entrance. The TMP sets out access routes, timings, signage and protocols for delivery vehicles.

Deliveries will be programmed within core hours to reduce disturbance:

- 07:30–18:00 Monday–Friday
- 08:00–13:00 Saturday
- No deliveries during the night-time span lift

A booking system will be used to avoid multiple vehicles arriving at once. Unscheduled deliveries will be refused or redirected safely. One vehicle will unload at a time within the compound to maintain safe control of movements.

Sustainable travel options will be encouraged, including car sharing, cycling and use of public transport. Virtual meetings will be used where possible to reduce unnecessary vehicle trips.

Temporary traffic measures such as cones, signage and banksmen will protect the public and maintain traffic flow, except during the approved night closure for the bridge lift.

Vulnerable Road Users (Pedestrians/Cyclists):

- The south-side footway and cycle lane on St Andrews Road will remain open and segregated. All HGV arrivals and departures will be managed by a banksman to protect pedestrians and cyclists.
- Signage will include:
- "Caution – HGVs Turning"
- "Pedestrians This Way"
- "Cyclists Dismount / Rejoin Cycle Lane" (as required)
- Pedestrian routes will be kept unobstructed; any temporary diversion will be clearly signed. Access gates will remain secured to prevent unauthorised entry.
- Daily checks will review signage, footway conditions and safe access arrangements.

Traffic & Transport – Routing

Access for all construction vehicles will be via the west gate off St Andrews Road, unless otherwise agreed in the TMP. The route avoids sensitive residential roads and maintains separation from Cummins internal operations.

Control	Measures
Access & Scheduling	• Just-in-time delivery bookings • Maximum of one vehicle unloading at a time • No deliveries during the scheduled night-time closure for the bridge lift
On-Site	• Engines switched off when stationary • 5 mph speed limit inside the site • Broadband (white noise) reversing alarms used on all plant • Deliveries carried out within the compound to keep the highway clear
Parking & Communication	• Designated parking within the site compound • No overspill parking allowed on surrounding streets • Traffic requirements communicated through induction and toolbox talks

Control of Site Traffic:

Traffic routes and timings will follow the approved Traffic Management Plan and the arrangements agreed with Kirklees Highways. St Andrews Road will remain open throughout the works except during the planned night-time closure for the bridge lift.

- The TMP will be displayed at the site entrance and will set out routes, signage and specific traffic controls
- Daily HGV logs will be maintained and reviewed
- Weekly checks will confirm compliance with the TMP
- Any complaints will be recorded and managed in line with the site complaints procedure
- Traffic-related risks will be addressed within the RAMS and reviewed at monthly audits

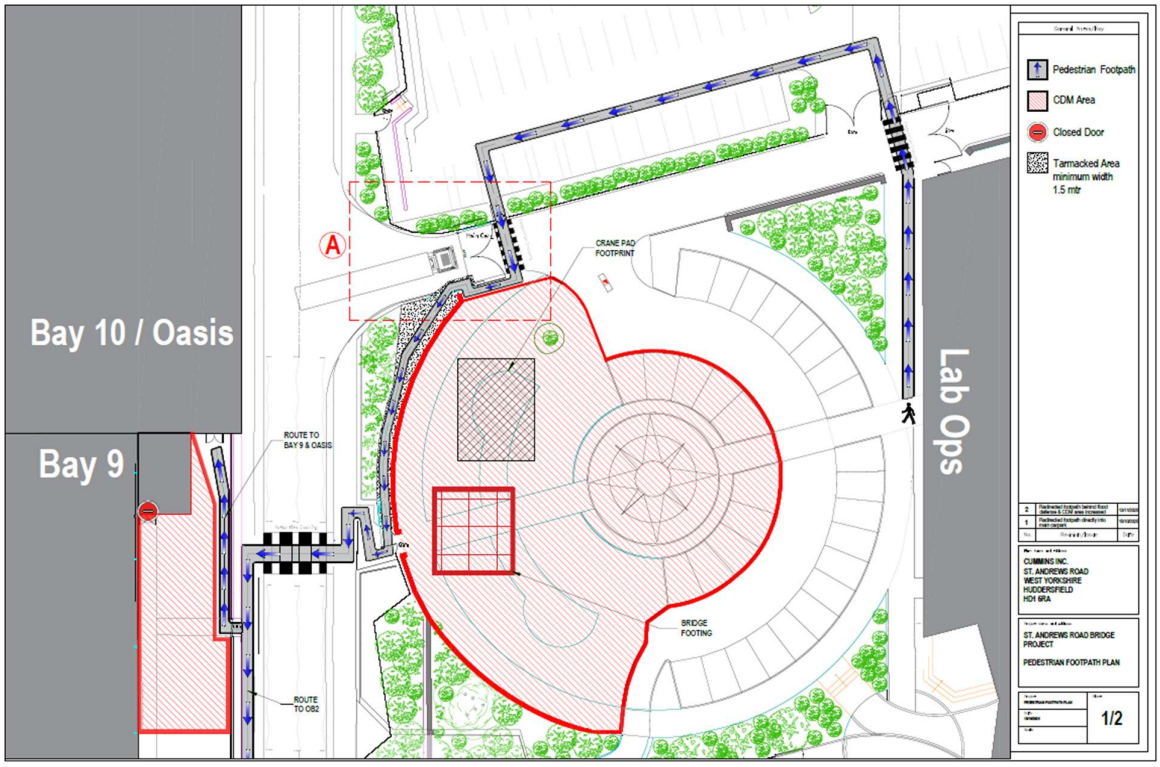

Diagram showing CML CDM areas (red) and pedestrian management routes of Cummins Personnel with vehicle entry and exit point at main gate.

6.6 Hazardous Substance Storage & Pollution Prevention

Aspect

Hazardous substances will be stored and used during construction, primarily fuels, oils, lubricants, solvents, cleaning agents and resins. These materials are required for plant operation, maintenance and general construction activities.

Impact

Poor handling or storage of hazardous liquids can result in spills with potential to cause:

- Pollution of foul or surface water systems
- Contamination of land and groundwater
- Harmful exposure to workers or nearby users
- Localised odour or nuisance

Mitigation Controls

Pollution prevention measures will be implemented in accordance with the Water Resources Act 1991, Environmental Protection Act 1990 and current Environment Agency guidance.

All deliveries will be supervised by a competent person capable of dealing with any spills or other incidents that may occur. The level of all storage tanks will be checked before delivery to prevent overfilling and to ensure that the product is delivered to the correct tank.

A designated fuel and hazardous storage area will be set up within the site compound to ensure containment of any ongoing and potential accident spillage.

Further controls include:

- Compliance with current EA pollution prevention guidance (e.g. Oil Storage Regulations for Business)
- Use of drip trays beneath static plant, pumps and generators
- Regular inspection of bunds and drip trays; rainwater removed and disposed of correctly
- Small fuel containers stored on absorbent pads when in use
- Refuelling only in designated areas by trained personnel
- Toolbox talks provided on refuelling and spill response
- COSHH materials stored in locked chemical cabinets with SDS information available
- Spill kits containing absorbents and disposal bags will be located at high-risk points and checked regularly.

Although the former EA Pollution Prevention Guidelines (PPGs) have been replaced by online guidance, they remain a useful framework for good practice. This project will consider the principles contained in:

- PPG2 – Above Ground Oil Storage
- PPG3 – Oil Separators in Surface Water Systems
- PPG7 – Refuelling Facilities
- PPG13 – Vehicle Washing and Cleaning
- PPG26 – Drums and IBCs

7. ENVIRONMENTAL MANAGEMENT SYSTEMS PROCEDURE

7.1 Management of Contractors

Contractors must provide method statements and risk assessments for all planned activities. These documents must identify the environmental aspects and impacts of the work and describe the controls that will be used. All documentation must be submitted to the Principal Contractor before work starts so that it can be reviewed and approved.

Method statements must include as a minimum:

- A description of the work
- Environmental impacts associated with the activity (e.g. waste, noise, dust, vibration, hazardous substances)
- Details of plant, equipment, working hours, access arrangements, traffic movements and expected waste/emissions
- Environmental control and mitigation measures
- Monitoring requirements
- Emergency preparedness and spill response procedures

Method statements must also confirm that the following controls are in place:

- Waste is segregated at source and placed in appropriate containers
- Fuel is stored in double-skinned bowsers, tanks or within a bunded area
- Drip trays or absorbent pads are used under static plant
- Hazardous chemicals have up-to-date COSHH assessments, are correctly labelled and stored in locked COSHH cabinets
- Spill response arrangements are in place and operatives know how to use spill kits
- All spills are reported immediately
- Plant and vehicle engines are switched off when not in use
- Excavation work will stop immediately if unexpected contamination is found and the Principal Contractor informed

Before starting work on site, the Principal Contractor will brief all contractors on the following:

- Nomination of a responsible person to oversee quality, safety and environmental matters
- Requirement to follow all Principal Contractor instructions
- Attendance at a formal site induction
- Immediate reporting of any injury, damage, loss or environmental incident
- Requirement to obtain approval before subcontracting any work
- Requirement to notify the Principal Contractor of any deviation from agreed working methods

7.2 Training & Competency

All operatives working for the Principal Contractor or subcontractors must be competent to carry out their tasks, especially where activities may affect the environment. Competence includes appropriate training, qualifications and experience. Competency forms part of the pre-qualification process.

All operatives will receive an environmental induction before starting work. This will include:

- Overview of the CEMP
- Project management structure and key roles
- Environmental aspects and impacts relevant to the project, including: Air quality (dust and odour), Noise and vibration, Waste management, and Hazardous substances.
- Pollution prevention and site control measures
- Emergency procedures including spill response, reporting and corrective actions
- General environmental awareness

The Principal Contractor will keep a record of all inductions. Records will include the name and organisation of each attendee, their signature and the date of induction. These records form part of the documented evidence for implementing this CEMP.

7.3 Communication & Complaints

Internal Communication

A copy of this CEMP will be kept on site for the duration of the works and issued to the project team and all contractors. Key environmental requirements will be communicated through inductions, toolbox talks and pre-task briefings. The environmental policies of the Client and Principal Contractor will be displayed on site.

Environmental management meetings will be held at agreed intervals (weekly or monthly). The agenda will include:

- Communications and complaints received
- Environmental incidents and near misses
- Updates to the CEMP or working methods
- Training and briefing requirements

Internal communication occurs on an on-going basis and is achieved through various mechanisms that include, but are not limited to Email; Toolbox Talks, Team meetings and briefings; Noticeboards; Minutes of meetings and Training sessions.

The Principal Contractor will maintain a register of attendees at meetings and briefings. The register will record names, organisations and signatures.

At the end of each toolbox talk, operatives will be invited to raise concerns. These will be recorded in the comments section of the Toolbox Talk Record Sheet and actioned where required.

External Communication

Procedures will be followed to ensure the local community is informed about any works that may affect them. This will include information on how impacts will be managed and the details of the site contact responsible for dealing with public queries.

External liaison will be maintained throughout the works and may include:

- Consultation with statutory bodies such as Kirklees Council and the Environment Agency
- Providing information to community representatives on upcoming works when required
- Advance notification to those most likely to be affected by specific activities, delivered through written correspondence or direct communication

Complaints

Any concerns raised by local residents, businesses or statutory bodies must be reported to the Principal Contractor. If any site operative receives a complaint directly, they must pass it immediately to site management. The complaints process will be explained to all operatives during the site induction.

When a complaint is received, the Principal Contractor will enter the following information into the Complaints Log:

- Description of the issue raised
- Name and contact details of the complainant
- Date and time of the complaint
- Preferred method of contact

The Principal Contractor will notify the Senior Management Team of all complaints. Each complaint will be reviewed and investigated where required, and corrective or preventative actions will be implemented to address the issue.

If a similar complaint has been made previously, the Principal Contractor will review earlier records and confirm whether earlier corrective actions were completed and effective. Any additional measures needed will be agreed and implemented.

7.4 Emergency Preparedness & Response

Emergency Spill Control

Immediately after observing any leakage or spillage of oils, fuels, or chemicals at the site; works should cease immediately until deemed safe to continue by the Principal Contractor.

If the spillage consists of flammable liquids all possible sources of ignition should be extinguished, and the Principal Contractor informed immediately. The Principal Contractor should contact the Client as soon as reasonably practical to inform of the incident.

It will be the responsibility of Principal Contractor & Site Operatives to identify the source of the leakage/spillage and seek to rectify the problem or reduce the amount of material that could continue to leak out. On open ground use absorbent pads as a barrier to any further contamination. If required put on appropriate Personal Protective Equipment prior to coming into direct contact with any leaked/spilled material.

Once the leak has been stopped, containment measures will be implemented:

- Construct a small bund using absorbent material to prevent further spread
- Deploy booms or absorbent socks to protect or isolate drainage points
- Use absorbent pads or granules for internal areas

Excavate contaminated soil where necessary and place it in the designated quarantine area for assessment and waste classification in accordance with WM3.

It is crucial to protect any spillage from entering a sensitive receptor area. Should any spillage enter a sensitive receptor and cause a pollution incident it will be the responsibility of Principal Contractor site management to inform the EA on the emergency pollution incident number 0800 807 060.

In the event of an incident that requires the emergency services attendance dial 999.

Once all spilled materials have been contained, clean-up of the material should commence. All contaminated materials (soil, sand, absorbent granules) should be disposed of as hazardous waste in line with current waste regulations. Materials should be placed in the hazardous waste wheelie bin; however, for bigger spillages a larger waste receptacle such as a self-contained skip should be used. These can temporarily be held at the quarantine area. All contaminated material must be forwarded to an appropriately licenced recovery or disposal site as specified by a technically competent manager or environmental consultant.

All leaks and spills must be fully investigated by the Principal Contractor along with the immediate replenishment of any materials and items taken from the emergency spill kits.

Incident Investigation

All environmental incidents will be reported directly to the Principal Contractor immediately and to the Client as soon as reasonably practicable.

Examples of environmental incidents can include:

- Spillage of hazardous substance onto ground, into drains or a watercourse.
- Damage to the habitat of protected species.
- Releases of significant dust, particulates and odours that cause a nuisance to the local community.
- Incidents involving fugitive releases of waste or the non-compliant transfer of waste.
- Noise emissions leading to human health impacts and/or statutory nuisance.

All Environmental Incidents must be notified to the Project Environmental and safety incidents to the Safety Manager. The Emergency Coordinator will notify the client of the incident and ensure they are kept up to date with any close out actions taken.

The Project Environmental Officer will report to the Principal Contractors Environmental Officer as outlined in the Principal Contractors Environmental Procedure. The Site Manager will verbally notify all major environmental incidents to the Principal Contractors Environmental Officer within one hour. This notification will be followed up within 24 hours by sending a copy of the Non-Conformance Report relating to the incident to the Principal Contractors Environmental Officer with a written explanation of the cause and the proposals to prevent recurrence of the incident.

The Principal Contractor will complete a formal written investigation by completion of a Non-conformance Report. The investigation must be carried out in a timely manner and should focus on gathering evidence and information including but not limited to:

- Description of events.
- Photographs.
- Drawings, sketches.
- Details of applicable substances.
- Witness statements.
- Description of damage.
- Analysis and physical investigation of any contamination.

The information gathered during the investigation should be analysed to determine:

- Factors contributing to the incident and root causes; and,
- Opportunities for corrective and preventative actions.

All site operatives connected to the incident may be included in the investigation process when required by the incident investigator.

On completion of the incident investigation, the Principal Contractor will identify a suitable corrective and preventative action to mitigate the incident from occurring again. On completion, Principal Contractor should also conduct a review of the CEMP and any associated environmental aspects and impacts evaluations and make suitable amendments if required.

Table 5 below displays the key emergency contact information.

Table 5 – Emergency Contact Details

Contact	Address	Contact Details	Role/Function
Environment Agency	Lateral City Walk Leeds LS11 9AT	03708 506506	Environmental protection and pollution control

Contact	Address	Contact Details	Role/Function
Kirklees Council	Civic Centre 3 Market Street Huddersfield HD1 2EY	01484 221 000	Planning & Environmental Health
Project Manager: Ian Dimmock	CML The Coach House Mansion Gate Drive Chapel Allerton Leeds LS7 4FE	07720 414006 i.dimmock@cml.uk.com	Principal Contractor
Environmental Manager: Neal Burrows	As Above	0113 2620000	Principal Contractor

7.5 Maintenance of Plant & Equipment

Maintenance of Plant & Equipment

All plant shall comply with PUWER 1998, LOLER 1998, and NRMM (EU) 2016/1628 Stage V emissions (GBCA marked). Principal Contractor to verify hire schedules; maintain Plant Register (Appendix F). Cross-ref Noise Section 3.1.1 (silencers/covers).

Key Controls:

Control	Measures
Hire & Procurement	• Hire orders will specify compliant, well-maintained plant suitable for the task • Required documentation (e.g. service records, LOLER certificates where applicable) must be provided before the plant arrives on site
Inspections & Checks	• Operators will complete daily pre-use checks and record defects immediately • Weekly inspections will be carried out by the Principal Contractor • Engines must be switched off when not in use

Control	Measures
Handover & Defects	• All plant will undergo checks on arrival and any defects will be reported to the hire provider • Non-compliant plant will be quarantined until repaired or replaced
Repairs & Records	• Minor repairs may be undertaken on site; major repairs will be completed by the hire provider • Records of inspections, defects and maintenance will be retained by the Principal Contractor

Monitoring: Include in weekly audits (first Dec 2025); toolbox talk Dec induction. Report defects immediately (NCR per Section 7.1).

7.6 Monitoring & Audit

Environmental monitoring allows the Principal Contractor to assess the effectiveness of mitigation measures and identify issues early. Findings will be used to make improvements and maintain compliance throughout the works.

The Principal Contractor will carry out appropriate environmental inspections and monitoring of environmental performance on a monthly basis. An audit checklist will be used which provides the mechanism to monitor and assess compliance against all the Principal Contractor's requirements and standards.

In addition, the Principal Contractors Site Manager and supervisors are responsible for monitoring Contractors to ensure work is being undertaken in accordance with the agreed safe system of work, environmental procedures and to the standards of quality required

Appendix A – Drawings

Appendix B – Construction Programme