WATERWAY DRAINAGE ENGINEERING

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN

Land to the north of Coach Road
Whitehaven
Cumberland
CA28 9DF

October 2025
2024-099
Rev A

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1.0 INTRODUCTION

1.1 APPOINTMENT

Waterway Drainage Engineering Ltd was instructed by PRIMA Homes Group Ltd (the "Client") to assist in the production of their Construction Environment Management Plan (hereafter referred to as 'CEMP') for the proposed construction of up to 35 residential dwellings, along with landscaping and associated infrastructure at Coach Road, Whitehaven (the "Site").

Whilst drafted by Waterway Drainage Engineering Ltd, the CEMP will be managed, controlled and updated by the Client during the course of the development and the Client will assume responsibility for it along with requirements outlined if they choose to adopt it.

1.2 CONTEXT AND PURPOSE

This document is to be submitted to Cumberland Council in support of the discharge of planning condition 13 under the existing consent (planning reference: 4/22/2466/0F1) to fulfil the requirement for a Construction Environment Management Plan.

The CEMP will form part of the Client management system required to deliver the above project and identifies the project management structure roles and responsibilities with regard to managing and reporting on the environmental impact of the construction phase. The overall environmental objectives that will be applied to the project are:

- All practicable steps shall be taken to minimise the environmental effects of construction works;
- All activities shall be conducted in accordance with the CEMP, relevant legislation, Codes of Practices, Guidelines, and local environmental procedures;
- Environmental licenses, permits and consents and other statutory requirements are to be obtained prior to works commencing, and fully complied with;
- All staff (including sub-contractors) shall be aware of the environmental issues relevant to the Project through the provision of Site-specific information on the environmental impacts of construction and the mitigation measures to be applied during inductions, briefings and toolbox talks;
- Regularly reviewing the environmental requirements of the project and ensuring that environmental controls remain adequate throughout the duration of the project.

1.3 ROLES AND RESPONSIBILITIES

This section describes the environmental roles and responsibilities of key members of the project team. Individuals should be assigned to each of the roles and responsibilities outlined below to the 'Principal Contractor'.

Director

- To lead by example and champion all areas of environmental management;
- Ensure that appropriate resources are in place to effectively implement the CEMP and deliver all legal requirements.

Site Manager

- To lead by example and champion all areas of environmental management;
- Ensure that appropriate resources are in place to effectively implement the CEMP and deliver all legal requirements;
- Review the CEMP throughout the construction process to ensure it remains relevant and effective in identifying and managing environmental risks;
- Report to and agree in writing with Cumberland Council any amendments to the CEMP;
- Ensure that all legal requirements are identified and met;
- Ensure that the Site is safe and that hazards are identified and secured;
- Monitor performance of the project against statutory requirements, objectives and targets;
- Ensure that all documentation referencing environmental procedures and policy are relevant and up to-date and included within the CEMP;
- Manage all necessary documentation to demonstrate compliance with appropriate legislation for the required period;
- Identify necessary levels of environmental competence in staff and ensure necessary training is delivered to personnel;
- Manage investigation and resolution of complaints in accordance with the complaints handling protocol;
- Ensure correct procedures are followed in case of an environmental incident.

Construction Supervisors

- Ensure that the CEMP and associated documents and control methods are effectively implemented onsite on a day-to-day basis;
- Fully investigate and act on environmental incidents and report findings to the Site Manager;
- Conduct and document weekly environmental inspections;
- Ensure that environmentally orientated briefings and "Toolbox Talks" are being delivered to the site workforce;
- Implement and maintain environmental controls on-Site;
- Ensure action is taken on any spills/incidents that occur on-Site;
- Report activity that has potential to have an environmental effect immediately to the Site manager.

Site Staff & Sub-Contractors

- Compliance with direction given in the Site Induction;
- Proactively approach environmental issues whilst on-Site;
- Site staff should ensure they are fully aware of the environmental procedures in place and if they have any questions, they should be directed towards the Site Manager;
- Ensure all construction activities are carried out in line with the procedures detailed in the CEMP;
- Report environmental incidents to the Site Manager.

1.4 SOURCES

This CEMP has utilised a range of sources including but not limited to; recommendations made within the submitted environmental planning reports and associated planning conditions, general good construction Site practices and good housekeeping along with contractor specifications and government guidance. For clarity, the following sections of this document relate specifically to recommendations made within submitted environmental planning reports:

- Design and Access Statement 2245-D001 2245 Proposed Residential Development, Land off Coach Road, Whitehaven, Cumbria.
- Planning Statement - 2245-D004 2245 Proposed Residential Development, Land at Coach Road, Whitehaven.
- Development Sustainability Assessment - 2245-D002 2245 - Proposed Residential Development, Land at Coach Road, Whitehaven, Cumbria.
- Coach Road, Whitehaven Coach Road, Whitehaven Phase 1 Desk Study Report – Ref. 559-01
- Preliminary Ecological Appraisal - Land off Coach Road Whitehaven – Ref. MEP-22-03 R1
- Flood Risk Assessment COACH ROAD, WHITEHAVEN Ref. 23-C-16902 August 2023

2.0 SITE CONTEXT

2.1 SITE INFORMATION

The site is bounded by the culverted Pow Beck to the west and a section of the Coast 2 Coast cycle route to the east. The total site area is approximately 1.039ha in area with approximately 0.5ha covered in hardstanding. The remaining section, to the east of the site, is covered in scrubland.

The site at Coach Road, Whitehaven is centred approximately at the following National Grid Reference:

- Easting 297394
- Northing 517464

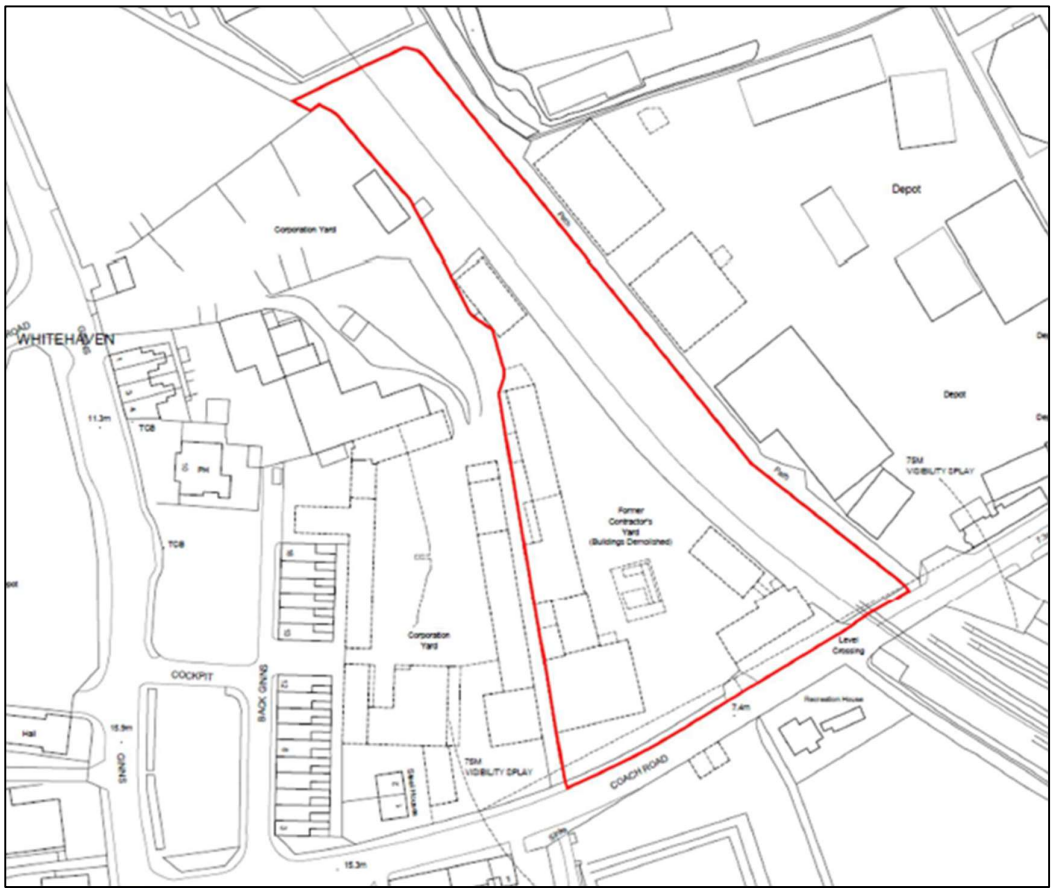

Figure 1: Site Location Plan

2.2 PLANNING

The planning application associated with the proposals (4/22/2466/0F1) gained full approval on the 13 May 2024 subject to a series of conditions. Specifically, this report is in relation to the discharge of condition 13 of the planning approval which is detailed below:

No development shall commence until a Construction Surface Water Management Plan (CSWMP) has been submitted to and approved in writing by the Local Planning Authority.

The approved CSWMP shall be adhered to throughout the construction period.

Reason To safeguard against flooding to surrounding sites and to safeguard against pollution of surrounding watercourses and drainage systems in accordance with the provisions of Policy ENV1, Policy ENV3, Policy DM24 and Policy DM25 of the Copeland Local Plan 2013-2028

It is noted that there is an extant planning approval on site (4/14/2124/0F1) to provide an extra care and dementia facility for people aged 55 and over for the site. For reference the facility included a three-storey apartment building providing 56 units and 4 bungalows.

3.0 MITIGATION OF NOISE AND VIBRATION

3.1 INRODUCTION

It is considered the Site lies within a noise-sensitive area, due to the adjacent residential development to the east and west. Normal construction working hours will be as follows:

- Monday to Friday: 08:00 am – 18:00 pm;
- Saturdays: 08:00 am – 13:00 pm;
- Sundays and bank holidays: No work permitted, or noisy work prohibited.

Deliveries will be as follows:

- Monday to Friday: 09:00 am – 18:00 pm (excluding between the hours of 15:00 pm- 16:00 pm during school term times);
- Saturdays: 09.30 am - 14.30 pm;
- Sunday or bank holidays: No deliveries.

3.2 SITE ACTIVITIES

Various activities carried out during construction have the potential to create noise of potential relevance to nearby receptors. Initial construction activities that may be undertaken and will require noise monitoring / control include:

- Earthworks;
- Stockpiling;
- Groundworks;
- Concreting;
- Construction deliveries;
- Construction traffic;
- Cutting & Sawing. Measures to be implemented that will reduce and / or avoid noise are as follows:
- Use of silenced plant where practical;
- Use of well-maintained modern plant which complies with the latest noise emission requirements as defined by BS 5228 standards;
- Reducing the need to adopt percussive and vibrating machinery;
- Toolbox talks and Site inductions;
- Site speed limit to be limited to 5 mph on unsurfaced roads;
- Where practical, noise emission limits for equipment brought to Site;
- Indirect method of controlling noise e.g. screening where appropriate;
- Administrative and legislative control; and
- Control working hours & delivery areas and times (see Section 3.1).

3.3 CONSIDERATE CONSTRUCTORS SCHEME

The construction industry has a huge impact on all our lives, with most construction work taking place in sensitive locations. Therefore, PRIMA Homes Group Ltd will work closely to the Code of Considerate Practice, which commits those sites, companies and suppliers registered with the Scheme to care about appearance, respect the community, protect the environment, care about safety and value their workforce.

3.4 PLANT AND MACHINERY

Selection of equipment will, as far as reasonably practicable, seek to control and limit noise and vibration levels associated with construction activities. This will be accomplished by the following:

- Plant and equipment liable to create noise and/or vibration whilst in operation is, as far as reasonably practicable, located away from sensitive receptors. The use of perimeter fencing and acoustic bunds to absorb and/or deflect noise away from noise sensitive areas where deemed appropriate/necessary;
- All plant, equipment and noise control measures applied are maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable;
- Where reasonably practical, fixed items of construction equipment will be electrically powered in preference to being diesel driven;
- Vehicles and mechanical equipment utilised on Site for activities associated with the construction works will be fitted with effective exhaust silencers and maintained in good working order with sustained efficient performance and operated in a manner such that noise emissions are controlled and limited as far as reasonably practicable;
- Plant in intermittent use are shut down or throttled down to a minimum during periods when not in use;
- All Plant Operators shall undertake a daily inspection of the Plant or equipment prior to use with a recorded weekly inspection;
- All Contractors to be made familiar with current legislation and the guidance in BS 5228 (Parts 1 and 2), which should form a prerequisite of their appointment;
- Loading and unloading of vehicles, dismantling of Site equipment such as scaffolding or moving equipment or materials around the Site to be conducted in such a manner as to minimise noise generation and where practical to be conducted away from sensitive receptors;
- Careful consideration will be given to planning construction traffic haul routes within the Site and along local roads close to existing sensitive receptors, so as to minimise reversing movements and to minimise the number of construction vehicles during peak traffic flows on local roads.

Noisy activities will be accompanied by suitable and proportional risk assessments and reported noise complaints will be investigated thoroughly. PRIMA Homes Group Ltd have a designated Health Safety and Environment manager who will advise and support where necessary. In addition, in accordance with Health and Safety legislation and good site practices, risks to human health from exposure to noise at work will be prevented or reduced by undertaking the following:

- Assess the risks to all employees from noise at work;
- Take action to reduce the noise exposure that produces those risks;
- Provide all employees with hearing protection should it not be possible to reduce the noise exposure enough by using alternative methods;
- Ensure the legal limits on noise exposure are not exceeded;
- Toolbox talks, Site inductions and training to all Operatives.

3.4.1 Plant and Machinery Location

Table 1 below details where other activities will be carried out:

Construction Activity	Construction Traffic	Plant and Machinery Location
Site Establishment	Welfare cabins, plant, fencing, barriers and hoarding	Site Compound
Earthworks and Groundworks	Plant, spoil, rebar, steel, drainage	All areas
Concrete	Concrete wagons, pump	All Areas
Roof Works	MEWP's, roof materials	Around dwellings
MEWP's = Mobile Elevating Work Platform		

Table 1: Plant and Machinery Location

3.5 VIBRATION

All works involving noise / vibration will be avoided or minimised where possible and the following measures will be adopted to reduce vibration:

- Risk Assessment and mitigation plans;
- Use of silenced plant where practical;
- Use of well-maintained modern plant where practical;
- Effective vibration monitoring if deemed required e.g. percussive piling adjacent to residential properties.

4.0 AIR QUALITY AND DUST

4.1 INTRODUCTION

This section may need updating following receipt of the draft technical reports for the Site.

Construction actives have the potential to create a dust nuisance, however dust suppression will be undertaken throughout the construction phase to limit this alongside the application of good housekeeping measures. Effective management of the following will help to minimise dust nuisance:

4.1.1 Pre-project Planning

- Method statements to include processes for controlling dust;
- Setting of speed limit to 5 mph on unsurfaced roads;
- Preventative measures such as those detailed below.

4.1.2 Site Preparation and Construction

- Keeping fencing, barriers, scaffolding and screening clean;
- Construction areas to be cleaned and regularly swept to prevent the build-up of dust;
- Vacuum plant to be used with all dust generating equipment or use of active dust suppression e.g. water / mist where the plant and activity allows. Material Storage and Handling
- Unnecessary vehicle movements and manoeuvring will be avoided;
- Location of plant and vehicles away from sensitive areas or housed in closed environments where possible;
- Use of vehicles and plant with low emission levels;
- Regular maintenance of engines, plant, maintenance of pumps and bowser jets;
- Use of jet wash wheel-washes at egress points;
- Use of enclosed and sheeted lorries where practical;
- Prevention of unnecessary engine idling;
- Avoid heating with open flame burners;
- Using water sprays, sand or Hessian to reduce vapour emissions;
- Use of handling methods to minimise dust generation.

4.1.3 Haulage and Vehicle Routes

- Damping down areas likely to cause dusts with water where practical;
- Ensure that skips are monitored to avoid being overloaded and contents are not to spill over the sides;
- Ensure methods and equipment are in place for immediate clean-up of accidental spillages of dusty or potentially dusty materials;
- Use spill kits for spillages and these must be available next to all refuelling points - location of fuelling points to be in a non-sensitive area, where practical.

4.2 MITIGATION

These mitigation measures have been set out in accordance with the IAQM guidance for construction dust and should be carried out where practical and the Site layout allows:

- Display the name and contact details of person(s) accountable for air quality and dust issues on the Site boundary. This may be the environment manager/engineer or the Site manager;
- Display the head or regional office contact information;
- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken;
- Ongoing dialogue with the Local Authority Environmental Health department regarding complaints;
- Record exceptional incidents that cause dust and/or air emissions, either on- or off- Site, and the action taken to resolve the situation in the log book;
- Undertake regular on-Site and off-Site inspection, during continuous dry periods, inspections should be undertaken more frequently i.e. daily. Inspections should be undertaken where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the Local Authority when asked. Where necessary, this should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of the Site boundary, with cleaning to be provided if necessary;
- Increase the frequency of Site inspections by the person accountable for air quality and dust issues on Site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions (specifically if receptors e.g. housing are downwind from the Site);
- Agree dust deposition, dust flux monitoring locations with the Local Authority;
- Plan Site layout so that machinery and dust causing activities are located away from receptors, as far as practical;
- Locate stockpiles away from sensitive areas;

- Damp down the Site or specific operations where there is a high potential for dust production and the site is active for an extensive period;
- Avoid Site runoff of water or mud;
- Keep Site fencing, barriers and scaffolding clean using wet methods;
- Remove materials that have a potential to produce dust from Site as soon as possible, unless being reused on-Site. If they are being re-used on-Site, cover as described below;
- Cover, seed or fence stockpiles to prevent wind whipping;
- Ensure all vehicles switch off engines when stationary - no idling vehicles;
- Avoid the use of diesel, or petrol, powered generators and use mains electricity or battery powered equipment where practicable;
- Impose and signpost a maximum-speed-limit of 10 mph on surfaced and 5 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the Local Authority, where appropriate);
- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems;
- Ensure an adequate water supply on the Site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate;
- Use enclosed chutes and conveyors and covered skips; Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate;
- Ensure equipment is readily available on Site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods;
- No bonfires and burning of waste materials;
- Avoid explosive blasting, using appropriate manual or mechanical alternatives; • Bag and remove biological debris or damp down such material before demolition;
- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable for stockpiles that are to remain for an extended period; • Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable;
- Only remove the cover in small areas during work and not all at once;
- Avoid scabbling (roughening of concrete surfaces) if possible;
- Ensure sand and other aggregates are located away from sensitive receptors and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place;
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery;

- For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust;
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, material tracked out of the Site. This may require the sweeper being continuously in use;
- Avoid dry sweeping of large areas;
- Ensure vehicles entering and leaving the Site are covered to prevent escape of materials during transport;
- Inspect on-Site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable;
- Record all inspections of haul routes and subsequent action in a Site log book;
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned;
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the Site where reasonably practicable);
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the Site exit, wherever Site size and layout permits;
- Access gates to be located at least 10 m from receptors where practical.

5.0 GENERAL SITE MANAGEMENT

5.1 GROUND

Safe working practices should be undertaken and appropriate Personal Protective Equipment (PPE) should be used alongside reference to the Construction (Design and Management) Regulations 2015.

During the construction phase of the works and the unlikely event that pockets of isolated contaminated soils may be discovered, this may release or increase the mobility of contamination present. If contamination is identified the potential effect will be assessed prior to the implementation of suitable mitigation measures. Records of such areas will be maintained and recorded within the validation reports for the construction works

5.2 WASTE STORAGE AND REMOVAL

Good construction site practices should be followed to ensure safe and secure storage and removal of both non-hazardous and hazardous waste.

Non-hazardous Waste Environmental Working Procedure

- Proper and safe disposal of waste must be ensured even after it has been passed on to another party. The Duty of Care has no time limit. It extends until the waste has either been disposed of or fully recovered;
- Duty of Care requires that all waste is stored and disposed of responsibly, it is only handled or dealt with by authorised individuals or companies and a record is to be kept of all waste received or transferred (e.g. a Waste Transfer Notes (WTN)). These must be created for each load of waste that leaves Site. The waste should be adequately described on the WTN;
- Ensure those that treat, store or dispose of the waste have a Waste Management Licence or Exemption certificate;
- Ensure the supplier is a registered waste carrier for this purpose;
- Ensure that all wastes that arise irregularly (e.g. redundant materials, wastes arising from cleaning up spills) are declared on WTNs;
- Ensure that all Contractors use the identified skips and bins and that these are kept in good order. No waste is to be left on the floors around the bin/skip. Use skip sheeting to reduce dusts or wind scatter.

5.3 LIGHTING

Lighting will be used when necessary, for health and safety purposes and to provide clear visibility on working areas. Lighting will be chosen that is fit for purpose and controlled so far as practical to limit light spill on the surrounding areas. Construction lighting will be brought on to Site when it is required and will be turned off when no longer required for specific tasks. Lighting will also be in accordance with considerate contractor requirements and in accordance with Section 3.3 of this document.

5.4 LITTER MANAGEMENT AND BOUNDARY TREATMENT

Bins and skips will be appropriately located across the Site where practical and continued monitoring, part of general good construction site practices, will take place to ensure a clean and safe working environment. Routine inspections of the boundary and fencing will also take place and incorporate effective litter management to ensure no detriment to the surrounding environment.

5.5 COMMUNICATION

This project will employ effective recording of all environmental incidents and/or complaints. Any complaints will be recorded and appropriately investigated and resolved where applicable. Construction Site management and project manager details will be fully available and located in a prominent places along the perimeter.

5.6 COMPUND, STORAGE, WELFARE, SIGNAGE AND SECURITY

A compound will be set up within the Site hoarding. The compound shall be surrounded by barrier fencing. All welfare facilities and storage will be within the confines of the compound. The Site shall be opened and locked by the Site Supervisor at the start and end of every shift.

6.0 CONSTRUCTION WASTE AND POLLUTION PREVENTION

6.1 POLLUTION PREVENTION

The management of pollution risk will be integral to the planning and design of the development works. All activities will be assessed for the potential to cause pollution and appropriate measures put in place to minimise risk.

Storage of fuel and oil

- Refuelling facilities for mobile plant will be provided on-Site and fuel storage may be required for the operation of generators, pumps etc., where mains electricity connections are not available;
- Storage facilities will be within a secure area, minimising the risk of leakage caused by the actions of trespassers. Delivery lines from tanks will be locked. Tanks will be located where the risk of accidental damage due to vehicle movements etc. is low, and away from drains and roads which could allow spillages to migrate into watercourses;
- Above-ground tanks will be provided with containment in accordance with the Control of Pollution (Oil Storage) Regulations 2001, for example by double-skinned tanks. Containment will be sufficient to contain 110% of the tank volume;
- Emergency response equipment (absorbents, drain blocking materials) will be kept on-Site and appropriate persons instructed in their use.

Storage and use of cement

- Concrete or cement mixing carried out will be undertaken on an impermeable surface, remote from surface water drains. Cement will be stored in a secure, dry, area. A designated area will be identified suitable for the cleaning of on-Site concrete batching equipment or wash-out of ready-mix Lorries, where contaminated water can be contained.

Storage of hazardous chemicals

- Quantities of hazardous chemicals such as herbicides, cleaning products and flammable gases may be required on-Site. All such materials will be stored in secure locations, with drip trays / containment where applicable. Quantities held in store should be minimised so far as practicable. Storage should be remote from drain connections to reduce the risk of water pollution in the event of leaks and spills.

7.0 PEST CONTROL

Pest control on the Site will be carried out for duration of the construction works using the Exclusion, Restriction, Destruction, Monitoring (ERDM) methodology.

8.0 CONCLUSION

This CEMP has been prepared in compliance with the requirements of Condition 13, for the residential development at Coach Road, Whitehaven (planning ref: 4/22/2466/0F1).

The CEMP will form a basis for the management of environmental impacts during the construction period. It will be a requirement that the developer adhere to the plan or notify Cumberland Council of any necessary variation as the development progresses.

Notwithstanding those elements specified in the CEMP, a high standard of environmental management will be maintained throughout with the objective of minimising impact on existing residents and the wider environment.

The CEMP should be kept under review throughout the development. Changes should be made in the event of any arising issues or potential improvements and Cumberland Council notified.