Leconfield Plots 9 &12

784-B065555

Construction Environmental Management Plan

Document prepared on behalf of Morgan Sindall Construction

January 2026

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ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
AOD	Approval of Condition Details
CC	Cumberland Council
CEMP	Construction Environmental Management Plan
CIRIA	Construction Industry Research and Information Association
CMS	Construction Method Statement
EA	Environmental Agency
ECoW	Ecological Clerk of Works
NPPF	The National Planning Policy Framework
PPE	Personal Protective Equipment
PRoW	Public Rights of Way
RMA	Reserved Matters Application
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1.0 INTRODUCTION AND DESCRIPTION OF THE WORKS

1.1 INTRODUCTION

1.1.1 Tetra Tech Limited (Tetra Tech) was commissioned by Morgan Sindall Construction (MSC) in March 2024 to undertake a Construction Environmental Management Plan (CEMP) of Leconfield Industrial Estate, Main Works site, hereafter referred to as "the site".

1.1.2 Cumberland Council seek to redevelop Leconfield Industrial Estate. This redevelopment is in two phases:

- **Phase 1** - Development of a new enterprise campus (the Hub)
- **Phase 2** - Levelling Up Fund (LuF) Project which includes the 'Main Works', Unit 1 and Unit 1A boundaries.

1.1.3 Main Works Plots 9 & 12 site consisting of two main buildings classed as general industrial: Plot 9 Building 12 approx. 2041m2 footprint with 4no. internal 'grow on' units and Plot 12 Building 14 approx. 2555m2 footprint with 5no. 'start up' units. This is set within a mix of hard and soft landscaping to provide car parking and HGV access to the units as well as incorporating a shared cycle and pedestrian access route running east west at the south of the site that links with the exiting coast to coast path just beyond the eastern boundary of the estate.

1.1.4 Cumberland Council, (herein 'the Applicant') is submitting a single stage application for 'main works plots 9 & 12 and associated landscape and biodiversity offsetting areas' for the redevelopment of the east section of Leconfield Industrial Estate. Previously, planning permission has been granted for the Cleator Moor Innovation Quarter Masterplan Application granted in September 2023. The purpose of the development is to redevelop a site on the Leconfield Industrial Estate which has fallen into disuse and provide employment opportunities. The 'main works' development which will be progressed via a single stage planning application is described as follows:

> *"Redeveloping buildings 12 (plot 9) and 14 (plot 12) and providing car parking and HGV access to the units as well as incorporating a shared cycle and pedestrian access route running east west at the south of the site that links with the exiting coast to coast path just beyond the eastern boundary of the estate"*

1.1 The red line boundary was amended in November 2025 to incorporate biodiversity offsetting areas, as requested by the LPA and is shown on the figures 1.1 and 1.2.

1.1.5 Therefore, this Construction Environmental Management Plan (CEMP) has been prepared by Tetra Tech on behalf the Applicant to accompany the planning application.

1.1.6 This report therefore seeks to describe the environmental mitigation measures that will be undertaken during the construction phase of the project.

1.1.7 This CEMP will discuss the following matters covered in Section 2 to 12:

- Principal contractor's roles and responsibilities;
- Construction working hours;
- Construction compound and vehicle details;
- Transport and traffic management;
- Cleanliness of public highways and wheel washing facilities;
- Control of dust and fumes;
- Control of noise and vibration;
- Control of contamination and material stockpile;
- Chemical storage and water pollution prevention;
- Control of waste;
- Protection of biodiversity.
- Archaeology and heritage; and
- Control of lighting.

1.2 REVIEW AND UPDATES OF THE CEMP

1.2.1 This document is a live document that will be kept on site for compliance. It will also be constantly reviewed by the Principal Contractor (i.e., every 6 months as a minimum) and updated following significant changes to the works, the working environment and/or as a result of an environmental incident.

1.2.2 This document has been produced in accordance with the mitigation measures recommended in the reports undertaken to date, and these should be followed, as applicable.

1.3 SITE DESCRIPTION

1.3.1 The 'main works' site is located in Cleator Moor, West Cumbria within the Cumberland Council and lies to the west of the UNESCO World Heritage site of the Lake District National Park and south east of the coastal town of Whitehaven. It is located within Cleator Moor town, between two main residential areas of settlement. The site forms part of the Leconfield Industrial Estate (eastern side) and covers an approximate area of 2.86 hectares (ha). Over the last 10 years the Industrial Estate has seen a significant decline, and has been underutilized for many years, with the demolition of circa 40-50% of the buildings. CC acquired the freehold of the industrial Estate in January 2021. The site comprises the following:

- unused buildings;
- hardstanding[1];

[1] Includes tarmac roads, car park areas, industrial yards and derelict hard standing patches where buildings were previously demolished.

- bare ground; and
- areas of scrub, grassland and woodland.

1.3.2 There is existing high value habitat located on the site which includes Open Mosaic Habitats on Previously Developed Land and wet woodland. Trees are also present at the site's eastern boundary and peppered across the site. These habitats provide a variety of nesting and foraging opportunities for a variety of bird species.

1.3.3 The site is accessed via the B5295 'Leconfield Street' at its southern boundary and is not fenced, resulting in public access not being fully restricted. The site is bounded by the Leconfield Industrial Estate to the north, west and south and by a cycle route a treeline, woodland areas and open fields / grassland to the east. The wider area is characterised by a mix of residential uses (to the west, east and south), retail and leisure uses (to the south-east) and agricultural fields under arable production (to the north). There is also a public footpath and small watercourse called Nor Beck running to the northwest of the site which has the potential for surface water flooding. It should however be noted there have been no incidents of historical flooding on the Leconfield Industrial Estate.

1.3.1 This CEMP relates to the construction works for the plots 9 and 12 including the landscape and biodiversity offset areas, which involves development of the eastern part of the Leconfield Industrial Estate. The Proposed Development is at RIBA Stage 4, an assessment of potential significant effects has been undertaken and documented in various reports.

1.3.2 The proposed Site layout is shown in Figure 1.1 below.

1.3.3 Currently, CC does not have any declared Air Quality Management Area (AQMAs) with the nearest AQMA to the site being located approximately 54 km to the east in Kendal. Air quality at the site is regarded as being very good[2]. Cleator Moor resides in the Lake District and there are very few heavily trafficked pollutant sources in the western parts of the Lake District. Air pollution levels in the region are thus expected to be low.

1.3.4 The site is located within Flood Zone 1[3] which indicates a low probability of flooding and there are no active surface water abstractions at or within 250m of the site. It is also not located within a source protection zone. There are two discharge consents operated by United Utilities Water Ltd relating to the discharge of public sewage into Nor Beck from a storm tank. There has been a pollution incident offsite (but within 250m of the site) where a minor incident occurred concerning oils/petrol polluting freshwater river/stream.

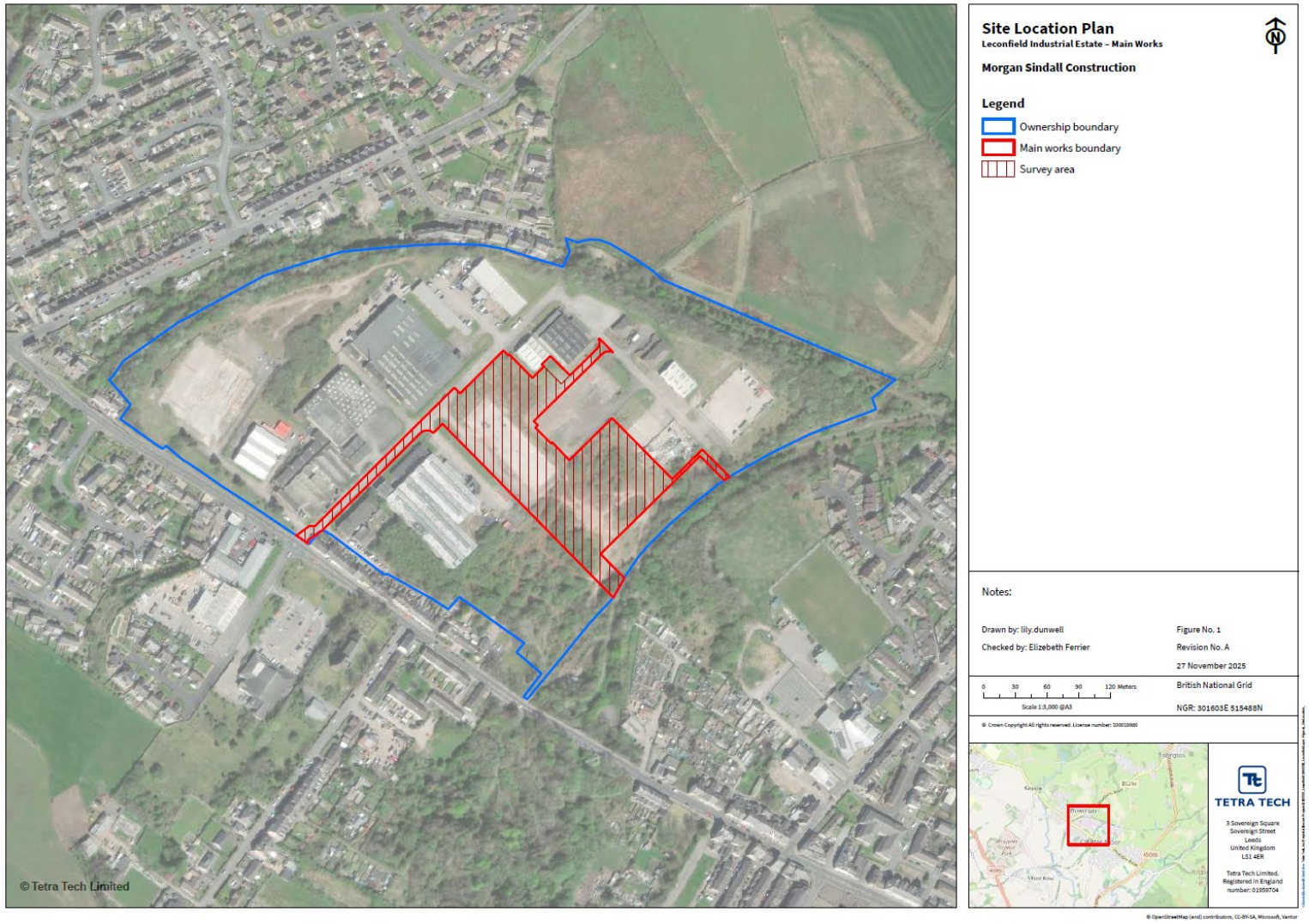
1.3.5 River Ehen Special Area of Conservation (SAC) is located 1.2 km south from the site boundary which is also a Site of Special Scientific Interest (SSSI).

1.3.6 The Leconfield Main Works site is approximately 90m south of the Nor Beck which runs in a western direction, joining Bowthorn Beck and is culverted under the wider Leconfield Industrial Estate in a southern direction.

[2] Air Quality Assessment for Leconfield Industrial Estate (2022).
[3] This is according to the Environment Agency Flood Map.

1.3.7 The Nor beck is culverted for approximately 630m under the wider Leconfield Industrial Estate and the residential area to the south, entering the River Keekle (approximately 880m from the southern boundary of Main Works site) which is a tributary of the River Ehen. The River Keekle joins River Ehen at Longlands Lake Country Park. Although, the River Keekle is hydrologically connected with the River Ehen, the component of the River Ehen designated as SAC is located directly upstream from the confluence point. Therefore, there is no direct hydrological connectivity between the site and the section of the River Ehen designated as a SAC.

Figure 1.1. Site Location Plan



1.4 PROPOSED DEVELOPMENT

1.4.1 The Main Works Plots 9 & 12 site consists of two main buildings classed as general industrial:

- • Plot 9 construction of one building 'Building 12' approx. 2041m2 footprint with 4no. internal 'grow on' units, and
- Plot 12 construction of one building 'Building 14' approx. 2555m2 footprint with 20no. 'start up' units.

1.4.2 Buildings 12 and 14 and light industrial-led mixed uses will be developed within these existing plots. No demolition of any buildings will be required with buildings 12 and 14.

1.4.3 The existing access from Leconfield Street will continue to be used. The existing private site access road is a circa 7.5m wide carriageway with 2.0m footways on both sides providing sufficient access for pedestrians and vehicles alike.

1.4.4 Car parking facilities and HGV access to the units will be provided as well as the incorporation of a shared cycle and pedestrian access route running east west at the south of the site that links with the exiting coast to coast path just beyond the eastern boundary of the estate. These routes will connect to the town centre and residential areas to the west.

1.4.5 Landscape and biodiversity offsetting areas will be part of the proposed development. This development proposals are shown on the Landscape Site Plan (Appendix B; Drawing Reference: LUF-ONEZZ-XX-D-L-0001-P22_LandscapeSitePlan).

Figure 1.2. Landscape Site Plan

2.0 ROLES AND RESPONSIBILITIES

2.1 KEY CONTACTS

2.1.1 The following people will act as the key contact for the development works which are to be carried out and they will be the main point of contact for any complaints which are received during the programme of works:

- Client: Cumberland Council
- Principal Contractor: Morgan Sindall Construction
- Site Manager: Greg Slater, Morgan Sindall Construction

2.2 GENERAL ARRANGEMENTS AND RESPONSIBILITIES

Client - Cumberland Council (CC)

2.2.1 CC is ultimately responsible for the content and implementation of this CEMP. This involves ensuring that all project staff comply with the requirements of the CEMP.

2.2.2 CC will ensure that all contractors, including sub- contractors, in connection with the development acknowledge this CEMP and adhere to the requirements set out in it, including any revisions of this document after compiling the contract.

Principal Contractor – Morgan Sindall Construction

2.2.3 The Principal Contractor appointed by CC will comply with all elements of this CEMP and shall be responsible for:

- Communicating the requirements of the CEMP to any sub-contractors;
- Liaising with all project team members on environmental issues;
- Maintaining an up-to-date register of legislation and meeting legislative requirements;
- Maintaining a register of actions carried out; and,
- Liaison with the General Public.

Site Manager- Greg Slater

2.2.4 The Site Manager, an employee of Morgan Sindall Construction, the Principal Contractor, will be responsible for the day-to-day management of Health and Safety, Environmental and Quality performance during the construction of the Proposed Development. The Site Manager is the main point of contact regarding the CEMP matters. This role includes inducting site personnel on the requirements of the CEMP and making staff aware of it prior to commencing any work on site.

2.2.5 It will be a requirement that the Site Manager conforms to ISO14001 and will also be responsible for implementing and maintaining the CEMP and monitoring the performance of sub-contractors. This will include participating in communication with CC and other third parties as

required. The Site Manager will also be responsible for ensuring that all staff on site receive the necessary health and safety and environmental induction prior to starting work on site.

Sub-contractors (TBC, awaiting appointment)

2.2.6 All contractors are responsible for leading the work of their particular discipline on the project. They are responsible for ensuring that the requirements of the CEMP are communicated to all site workers.

2.2.7 A senior manager of the site staff will be made the main point of contact regarding the CEMP matters and will report all incidents immediately to the Site Manager. This role includes inducting site personnel on the requirements of the CEMP and making staff aware of it prior to commencing any work on site.

Ecological clerks of works (Tetra Tech Europe)

2.1 An Ecological Clerk of Works (EcoW) will undertake precautionary Reasonable Avoidance Measures as set out in the Reasonable Avoidance Measures Report (Tetra Tech, 2025) comprising pre-commencement checks; toolbox talks and checks at the commencement of works.

2.2 The ECoW will conduct a site walkover with the nominated Biodiversity Champion at the beginning of the project to point out features and points of interest.

2.3 In the unlikely event that a protected species is found which has not been identified previously on Site, then the Principal Contractor's Site Manager will contact the Project Ecologist for advice, and all works in that area would cease. The Principal Contractor Site Manager will then await further instruction from the ecologist before proceeding with any works.

2.3 COMPLAINTS PROCEDURE

2.3.1 The complaints procedure is as follows:

- Contact details and site information will be provided around the site boundaries so that the general public can report any concern to the Site Manager via email or by phone. An out-of-hours number will also be provided for emergencies;
- If a site-based comment/complaint is received, then it is the responsibility of the Site Manager to provide an initial response. In case of emergencies, the response by the Site Manager to the emergency will be immediate;
- In other cases, the response to the complaint will be as soon as practical via the Principal Contractor (or their appointed relations consultant, if applicable); and,
- If the complaint is not resolved to the satisfaction of the complainant, then it will be escalated to an appropriate individual within the Principal Contractor's management team.

2.4 TRAINING, AWARENESS, COMPETENCE AND COMMUNICATION

2.4.1 Training, awareness, competence and communication are an essential component of environmental management on construction sites.

2.4.2 The Contractor is to develop a Safety Management Plan prior to commencing on site covering details of site inductions, toolbox talks and wider training.

2.4.3 The training procedure shall be developed by the Principal Contractor at subsequent stages. It is expected that this will address:

- Site induction training;
- Specialist environmental training; and,
- Toolbox talks.

2.5 ENVIRONMENTAL AUDITING

2.5.1 Environmental Auditing of the works for each parcel should be undertaken by the Principal Contractor, or their nominated consultant. This role should be used to:

- Determine conformance with the CEMP (this document);
- Ensure the CEMP is properly implemented and maintained; and,
- Determine the extent to which the requirements defined in project consents, management plans and environmental procedures have been met.

2.5.2 Internal audits will be undertaken on a regular basis. These audits will focus on site and task specific activities such as erosion and sediment controls, refuelling procedures and high-risk construction activities to ensure all controls and methodologies are being implemented as required.

2.5.3 The Principal Contractor will be responsible for ensuring that all non-conformances identified in an audit are closed out in a timely fashion as per the auditors' recommendations.

2.5.4 Results of the audits will be reported back to the Project team through a variety of mechanisms including site toolbox meetings and construction meetings.

2.6 PROCEDURE FOR MANAGEMENT, EMERGENCY AND INCIDENT REPORTING

2.6.1 The appointed Principal Contractor shall have procedures in place to deal with incidents involving environmental issues relating to site works.

2.6.2 All incidents shall be recorded and reported to Site Manager as soon as practicable and at least within 24 hours after the incident occurring, or serious incidents this timescale is reduced to no longer than an hour and if appropriate, reported to the Environment Agency (EA).

2.6.3 Environmental incidents shall be reported to the EA and the Statutory Authorities as required by EA Guidelines. The following should be included:

- Name, job title and contact telephone number of the manager/person reporting;
- Operational Depot/Business Department/Directorate;
- The name of the operative or member of public involved in the accident or incident;

- Employee status: direct labour or contract labour;
- Operative job title and the type of work activity being undertaken at the time of the incident;
- The relevant Manager/First Line Report;
- The date and time of when the incident occurred;
- A brief factual description of what happened (do not speculate or make assumptions). For security related incidents, this should include any items stolen (with an estimate of the cost), crime reference numbers and police details; and,
- Details of actions already taken to safeguard individuals and the public.

2.6.4 A follow-up report should also be produced providing details of all relevant information. This document should be held on record by the Principal Contractor until the project is completed.

3.0 CONSTRUCTION WORKING HOURS

3.1 RECOMMENDATIONS

3.1.1 The working hours for all construction activities, where reasonably practical, will be limited to the following times (excluding public holidays), unless otherwise agreed in writing by CC:

- Monday to Friday: 8:00 to 18:00;
- No working on Saturday, Sundays and/or Bank Holidays.

3.1.2 These hours will be followed unless otherwise agreed in writing by CC. Outside the above periods the following working is permitted:

- Emergency works; and,
- Works which do not cause noise that is audible at the boundary of the site and working area.

3.1.3 There may be exceptions to the above hours of working whereby construction operations outside of these hours may be agreed. In such circumstances the CEMP will need to highlight the process to be adopted to obtain the necessary agreement with CC in advance of the works being undertaken.

3.2 TIMING OF THE WORKS

3.2.1 The construction programme will be confirmed by the Principal Contractor. This will include the timing and duration of key construction activities and controlling the delivery of materials and equipment in line with the construction programme.

3.2.2 The Principal Contractor will produce a project schedule to plan noisy/intrusive and disturbing works around sensitive periods. These time periods will have to be agreed with CC in advance of being undertaken.

4.0 CONSTRUCTION COMPOUND AND VEHICLE DETAILS

4.1 BASELINE

4.1.1 The site is situated within the Leconfield Industrial Estate and located to the west of the UNESCO World Heritage site of the Lake District National Park.

4.1.2 Outside the site boundary, the site is bounded by commercial, agricultural and residential uses.

4.1.3 Currently, the site is accessed via Leconfield Street which bounds the site to the south. There are no footpaths or Public Rights of Way within the site.

4.1.4 There are existing bus services which operate along Leconfield Street to the south of the site. These services provide routes between Whitehaven and Workington.

4.1.5 The access arrangements for site traffic will be via the main entrance off Leconfield Street. There are no footpaths or PRoW within the Site, however, a shared cycle and pedestrian access route running east west at the south of the site that links with the exiting coast to coast path just beyond the eastern boundary of the estate is to be incorporated.

4.2 RELEVANT LEGISTATION AND GUIDANCE

4.2.1 The construction works need to adhere to Regulation 13 of the Management of Health and Safety at Work Regulations (1999) and the Health and Safety at work Act (1974) and ensure that unauthorised access to the site is prevented during the construction phase.

4.3 RECOMMENDATIONS

Construction Compound

4.3.1 Site Compound with double stacked accommodation and welfare, Electric Vehicle Charging point (EVCPO), DAB/Induction and vaping and smoking shelters. Two turnstiles , one from the North road entering the compound and one entering the site accessing both plots 9&12 from the compound. The car park is located next to the site compound. Three number 6m Vehicle gates positioned throughout the project to assist with project logistics with a smaller vehicle gate into the site compound (3m) to access the EVCPO.

4.3.2 Gate personnel will control access through gates access and they will manage traffic and logistics as per the MSC logistic Plan.

4.3.3 The construction compound will also consider the following:

- Wheel wash facilities will be located at the exit to gates.
- Spill kit will be in each gatehouse.
- Pedestrian access to the compound will be provided with routing clearly signed.
- Appropriate procedures will be in place for the safe marshalling of vehicles accessing and egressing the site as well vehicle operations within the site boundary.

- Warning signs will be displayed where construction vehicles are manoeuvring.
- Traffic marshals and banksmen, who will be appropriately trained in safe traffic management and control, will also be used to control vehicles when manoeuvring.

4.3.4 The following measures will be applied, as appropriate during construction works:

- Any office and welfare buildings shall be located within a secure compound.
- The site compound and maintenance compound (fuel storage and filling area) will be set within a secured compound.
- The site will provide a solid hoarding to reduce the visual intrusion into the site, noise effects from the construction works to nearest receptors and restrict access into the site.
- The top of the hoarding will have angled extensions (i.e., fans) if deemed necessary. This measure will make it more difficult to climb and throw unwanted material into the site.
- The boundary of the site will contain information to the public, such as health and safety information signs (e.g., deep excavations, construction accesses and routes, etc), contact details, telephone helpline number (for comments/complaints) and information on the works.
- Adequate lighting will be installed near the site boundaries.
- Signage in contractors' compounds relating to sensitivity of the designated site for nature conservation.

Deliveries

4.3.5 A designated area will be situated within the compound for the specific loading and unloading of materials and plant.

4.3.6 All deliveries to the site will be carefully managed and timetabled throughout the day to avoid simultaneous arrivals and/or departures.

4.3.7 No construction traffic or delivery vehicles will be permitted to park or reverse onto public roads for loading or unloading purposes and/or to reverse on site without a traffic marshal being present to control the operation.

4.3.8 Where possible deliveries will occur outside the network AM and PM peak hours. The timing of deliveries will be controlled and enforced using a delivery booking system which will be produced and operated by the Contactor's site traffic manager, with a view to managing the following potential issues:

- Queuing of construction vehicles outside of the site;
- Deliveries failing to arrive;
- Proactive management of deliveries where practicable to reduce the number of movements (i.e. a single full load is delivered, instead of two half loads);

- Providing greater control on the type of vehicles used wherever possible in order to improve sustainability;
- Preventing vehicles from arriving early on the off chance that they can be unloaded early;
- Spreading loads as evenly as possible to make the vehicle stable and verify that loads have not shifted during transit and are not likely to move or fall when restraints are removed;
- Providing an area free of overhead cables, structures and other obstructions, as well as a firm level ground to loading and unloading purposes; and,
- Making appropriate banksmen and personnel available to facilitate the delivery on site.

4.3.9 With the above in mind, the delivery booking system will contribute towards mitigating any negative potential transport related implications.

Safety

4.3.10 The staff shall adhere to the following procedures to ensure safety on site and during the construction works:

- Personal vehicles may only be parked in designated areas;
- All construction workers must use Personal Protective Equipment (PPE) whilst on site; and,
- The use of mobile phones and electronic devices will be limited.

5.0 TRANSPORT AND TRAFFIC MANAGEMENT

5.1 BASELINE

5.1.1 Access to the site will be via the B5295 'Leconfield Street' at its southern boundary. Vehicles exiting the site eastwards on the B5295 (Leconfield Street) and then southwards on Trumpet Road. The existing access from Leconfield Street will continue to be used. The existing private site access road is a circa 7.5m wide carriageway with 2.0m footways on both sides providing sufficient access for pedestrians and vehicles alike.

5.1.2 There is a Junction located to the east of the site, which connects Leconfield Street to the A5086.

5.2 RECOMMENDATIONS

5.2.1 The transport and traffic management will consider and follow the relevant legislation and policy identified above and where relevant, mitigation measures recommended in other reports including the transport assessment.

5.2.2 The proposed construction routing includes access via the main point of contact on B5295 'Leconfield Street'. All construction traffic will travel via the B5295 from either the A5086 (which links to surrounding area and beyond to the M6 motorway) or the A595 which links to Whitehaven and Sellafield. The contractor shall issue HGV routeing details to all subcontractors and suppliers as part of their contracts/purchase orders.

5.2.3 Adequate segregation along the access route will need to be in place to ensure construction vehicles do not conflict with other vehicles attending the site. The Contractor will erect any necessary barriers to demark the site and install any necessary traffic management. It should be ensured that no staff, suppliers and sub-contractors obstruct other site users, block roads or pavements at any time or in any way hinder other site users.

5.2.4 A temporary signage strategy (including any signage associated with temporary diversions) will be agreed with CC prior to installation and any works being undertaken on site. The temporary signage will be in place on the road network and at the site access point to ensure that all construction vehicles and staff travel on the correct routes.

5.2.5 Traffic marshals will be in place at the site access points during the construction period and at delivery locations within the site as defined in the MSC Logistic Plan. The use of traffic marshals will ensure that:

- Vehicle manoeuvres into and out of the site are undertaken assisted, safely and are monitored;
- All loading/unloading is undertaken within the site;
- Vehicles, wherever possible, do not stop at inappropriate locations on roads causing disruption to traffic and local residents; and,
- All traffic marshals will be qualified personnel.

5.2.6 Should any changes to the scheme as set out above be required they will need to be submitted and agreed with CC and (if appropriate) National Highways.

5.2.7 The Contractor will operate a traffic management system across the site, which will be relayed to all personnel during induction:

- All persons visiting the site shall be logged in and out; This will be controlled via “MSite”, which is a biometric turnstile system to log all site visitors.
- The general site speed limit in areas under construction will be limited to 5mph;
- The provision of temporary signalling should be considered where vehicle access to the site is likely to cause congestion or potential disruption;
- The Contractor shall agree a strategy of localised lane closures and/or diversion routes and if required these should be minimised and localised as far as is practicable;
- The movement of construction vehicles should be limited to non-peak hours where possible to limit any disruption to the local highway network;
- All construction traffic entering and leaving the site shall be closely controlled and HGVs making deliveries to the site or removing construction material etc, shall avoid prohibited routes;
- Prohibited routes for HGV traffic will be determined by the Principal Contractor;
- The site labour force shall be encouraged to use public transport and other sustainable modes of transport;
- The roads out of the site boundary will be kept clear at all times with clear access for fire appliances and emergency services;
- Deliveries reporting to the site office and all delivery drivers will be required to sign in and out on completion of a delivery;
- Banksmen will be present during reversing operations, where operator's view is obscured. Flashing beacons will be fitted to all on site vehicles and plant equipment; and,
- Site vehicles are to be fitted with reverse alarms to ensure safe manoeuvring.

5.2.8 Access routes through site will be kept clear to enable unrestricted access to foot/vehicular traffic, including the Emergency Services in the event of an emergency. Emergency escape routes will be designated prior to commencement of work.

Parking Area

5.2.9 Car park will be located next to the site compound. The car park will be large enough to accommodate contractor and visitor parking spaces.

5.2.10 Some on-site vehicle parking spaces will be provided for contractors and visitors in a designated area.

5.2.11 Site parking elsewhere by contractors outside this parking area will be limited. Parking off-site will also be discouraged and there will be minimal safe unrestricted parking available within reasonable walking distance of the site. This area will comprise walking routed for safety purposes and to avoid pedestrians to use car routes.

5.2.12 The vehicle parking area will be positioned within or as close to the contractor's compound as practical to minimise the disturbance of the surrounding area. It is recommended that this parking area is located near to the site entrance to reduce the amount of vehicular movement on site and thereby reducing the likelihood of vehicles taking mud/debris onto the existing highway network when leaving the site.

5.2.13 In order to avoid ground contamination and spillages, no vehicle maintenance or re-fuelling will be allowed within the site. Also, and as a precautionary measure, any vehicles parked on site will be required to display contact badges in the front window so that vehicles can be quickly moved if necessary.

5.2.14 The number of vehicles on site will be monitored and controlled. Sustainable modes of transport will be encouraged to reduce the number of single-occupancy vehicles parked on site, including car sharing and use of public transport.

6.0 CLEANINESS OF PUBLIC HIGHWAYS AND WHEEL WASHING FACILITIES

6.1 BASELINE

6.1.1 The site forms part of the Leconfield Industrial Estate and covers an area of approximately 2.86 ha. It is accessed via Leconfield Street and the site is not fenced and thus, public access to the site is not being fully restricted. CC is the local highway authority responsible for Leconfield Street. As a public highway, it is assumed that Leconfield Street is cleaned under standard Council maintenance regime. Any internal roads provided during the construction works will be cleaned under standard cleaning and maintenance operations.

6.2 RECOMMENDATIONS

6.2.1 Recommendations for the suppression of dust and dirt are also covered in section 7.0 of this CEMP, however, several of these measures are also provided below.

6.2.2 The construction works will involve the use of the local highways network by construction related vehicles. However, it is imperative that measures are put in place to minimise the deposition of mud and debris on the local road network generated by vehicular movements. These measures are outlined below:

- Wheel wash facilities will be provided on site to ensure mud or other material is not transported onto the public highway or other areas adjacent to the site;
- The type of wheel washing facilities will be appropriate to the types of vehicles being used for the development, but as a minimum this should be onsite jet washing;
- If the delivery of materials or the collection of waste from the site or other site traffic leads to mud or other debris being deposited on the public highway, then these roads will be cleaned immediately;
- When significant spoil removal is taking place a road sweeper and jet wash are to be used throughout the operation to ensure no material is deposited on the public highway;
- Lorries will be cleaned prior to leaving the site;
- Wheel wash areas will be contained and any debris appropriately disposed of to prevent suspended solids or contaminated waters from entering any nearby water courses or drains. To dispose of this water, it will be necessary to obtain the consent of the EA to discharge into the foul sewers, or if the water contains contaminants such as oil or fuel it will need to be disposed of as controlled waste, these location/s should be agreed with CC and should certainly be adjacent to site access/egress points;
- All vehicles leaving the site will be subject to a visual inspection before accessing public highways to ensure that the level of dust/mud/debris on the vehicles has been minimised insofar as is practical; and,
- All road surfaces affected shall be swept clean upon completion of the works.

6.2.3 As mentioned above Wheel wash facilities will be located at the exit gates to ensure it is used before vehicles exit the site.

6.2.4 All waste will be stored securely on site to prevent pollution and contamination. For this, a waste storage area will be provided with containers for the collection and segregation of waste. This will be clearly labelled and colour coded to facilitate re-use, recycling and recovery of waste. Waste will also be covered with sheeting or lids to prevent windblown or animal littering.

7.0 CONTROL OF DUST AND FUMES

7.1 BASELINE

7.1.1 It has been established that there are no active water abstractions at or within 250m of the site. The closest sensitive area is the River Ehen SAC 1.2 km south east from site which is also a SSSI. There are also seven local wildlife sites within a 2 km radius of the site.

7.1.2 There are residential receptors located to the west and south of the site.

7.2 RELEVANT LEGISTATION AND POLICY

7.2.1 Any works likely to generate dust or emissions needs to adhere to the following environmental legislation:

- Clean Air Act 1956; and,
- Pollution Prevention and Control Act 1999.

7.2.2 The construction works should adhere to the following air pollution guidance:

- Guidance on the Assessment of Dust from Demolition and Construction, IAQM, 2023; and,
- Environmental Good Practice on site, CIRIA C741, 2015.

7.3 MITIGATION MEASURES

7.3.1 The construction works will be carried out in accordance with the mitigation measures recommended in the air quality assessment, as well as the relevant legislation and policy identified above.

Dust Management

7.3.2 To prevent dust nuisance to sensitive areas and residential properties particularly during dry and windy weather, there will be adequate screening and damping down during all construction works and other site preparations (including storage of construction materials). Details of measures recommended include the following:

- Increased 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 periods of dry or windy conditions;

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible;
- Erect solid screens or barriers around dusty activities or the site boundary to the east that are at least as high as any stockpiles;
- Fully enclose site or specific operations where there is a high potential for dust production and the activities are being undertaken 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 re-used on site. If being re-used on site, cover as detailed below;
- Cover, seed or fence stockpiles to prevent wind whipping;
- 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 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; and,
- 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.

Measures Specific to Construction

- Avoid scabbling (roughening of concrete surfaces) if possible;
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place; and,
- 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.

Measures Specific to Trackout

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material transported out of the site. This may require the sweeper being continuously in use;
- Avoid dry sweeping of large areas;

- Ensure vehicles entering and leaving sites 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 any subsequent action in a site log book;
- Hard surfaced haul routes should be regularly damped down with mobile sprinkler systems or mobile water bowsers and regularly cleaned and,
- Access gate is to be located at least 10m from receptors where possible.

Generation of exhaust emissions by construction vehicles and plant

7.3.3 In order to reduce emissions generated by the construction works, the following measurements are recommended:

- Reducing the idle times by providing an efficient material handling plan that minimises the waiting time for loads and unloads. Reducing idle times could save up to 10% of total emissions during the construction phase;
- Implement toolbox talks and include driver training to ensure engines and plant are turned off when not in use for more than five minutes. This restriction will be enforced strictly unless the idle function is necessary for security or functionality reasons;
- Technical inspection of vehicles to ensure they will perform the most efficiently. Lorries and plant equipment with diesel engines on or off site should be well maintained in order to reduce emissions of visible smoke;
- Most of the vehicles will use Hydrotreated Vegetable Oil (HVO) on site.
- Vehicles with low exhaust emissions (e.g., with particle traps) and emission controls such as catalysts or diesel particle filters should be used; and,
- These measures will be promoted through the implementation of toolbox talks and driver training.

7.3.4 A toolbox talk will be delivered to contractors in respect to potential dust and other emissions effects.

7.4 MONITORING AND COMMUNICATIONS RECOMMENDATIONS

7.4.1 The following monitoring recommendations should be adhered to and details of how these will be implemented should be submitted and agreed to with CC at least four weeks prior to commencement of works on site:

- Records of dust and air quality complaints shall be kept, including likely causes and mitigation measures to reduce impacts if appropriate;
- Daily on-site and off-site visual inspections shall be undertaken and recorded;
- MSC will carry out air quality monitoring checks continually on site.
- Notify local community of works hours and any specific works which are likely to generate higher levels of dust/emissions;
- Notify local community of appropriate details to make complaints if necessary; and,
- Inspections will be increased during dry and windy weather and/or during periods of high activity (vehicular or earthworks) which is likely to increase sources of dust and emissions.

8.0 CONTROL OF NOISE AND VIBRATION

8.1 BASELINE

8.1.1 A Noise assessment produced by Miller Goodall in February 2022 identified the main noise sources within the site. Noise is mainly dominated by road traffic noise from Leconfield Street and Bowthorn Road along with noise from industrial uses and a fixed plant to the rear of Capital Aluminium Extrusions.

8.1.2 The closest residential receptors identified within the noise assessment are located adjacent to the site at:

- Heather Bank, James Street and Heathcote Park to the east of the site;
- Sanderson Park and Threaplands to the north west of the site;
- Bowthorn Road to the west of the site; and
- Leconfield Street to the south of the site.

8.1.3 The closest residential receptors identified above are unlikely to be impacted by construction of the Proposed Development.

8.2 RELEVANT LEGISTATION AND POLICY

8.2.1 Any noise or vibration related work needs to adhere to the following environmental legislation:

- Pollution Prevention and Control Act 1999; and,
- The Control of Noise at Work Regulations 2005.

8.2.2 The construction works should adhere to the following noise and vibration guidance or any appropriate revisions at the time of construction:

- BS 5228:2009, BS 5228-1 and A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise';
- Control of Noise at Work Regulations 2005; and,
- BS 7445:2003 'Description and Measurement of Environment Noise – Part 1: Guide to Quantities and Procedures'; BS 6472:2008 'Evaluation to Vibration in Buildings – Part 1: Vibration Sources other than Blasting'; and BS 8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings'.

8.3 MITIGATION MEASURES

8.3.1 The construction works will be carried out in accordance with the mitigation measures recommended in the Noise Assessment, as well as the relevant legislation and policy identified above. These measures will help safeguard existing residential amenity.

Construction Noise

8.3.2 Since construction works can generate significant noise levels by their nature, during the construction phase, 'Best Practicable Means', and the guidance provided within BS:5228 will be employed to minimise construction impacts and nuisance to the surrounding areas when these works are being carried out. Some of these will also include the following measures:

- Traffic to the site should be routed away from the internal road close to existing dwellings on Sanderson Park;
- Any new service yards should be located away from and should not have a direct view to existing dwellings;
- No deliveries will occur outside of the hours identified within this document unless agreed with CC;
- Careful selection of working methods and programme and quietest working equipment available;
- Provision of acoustic bunds/fencing will be provided.
- Where practicable, positioning equipment behind physical barriers, i.e., existing features, hoarding, etc;
- Ensuring that regularly maintained and appropriately silenced equipment is used in accordance with the manufacturer's instructions and will comply with the Control of Noise at Work Regulations 2005;
- Handling all materials in a manner which minimises noise, such as minimising drop heights;

- Switching all audible warning systems to the minimum setting required by the Health and Safety Executive. Reverse warning alarms should be fitted with white noise (broadband) systems;
- Where processes could give rise to significant levels of noise for extended periods of time, noise levels should be monitored regularly by a suitably qualified person with the survey results kept on file; and,
- In terms of on-site employees, appropriate actions will be undertaken regarding the Control of Noise at Work Regulations (2005) including the requirement for the use of ear defenders and appropriate warning notices.

8.3.3 Further to the above, operatives should be trained to employ appropriate techniques to keep site noise to a minimum and should be effectively supervised to ensure that best working practice in respect of noise reduction is followed. All employees should be advised regularly of the following, as part of their training:

- The proper use and maintenance of tools and equipment;
- The positioning of machinery on site to reduce the emission of noise to the neighbourhood and to site personnel; and,
- The avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment.

8.3.4 A toolbox talk will be delivered to contractors in respect to potential noise effects.

8.4 COMPLAINTS

8.4.1 As outlined in Section 2.0, prior to the commencement of construction works a contact number will be provided to allow users and members of the public to raise any concerns which they may have regarding the noise levels from the construction. The details of this phone number should be displayed on appropriate signage around the site boundaries. A letter drop will be provided to businesses and any other people who could potentially be affected by the construction noise to provide details of the works and the number to contact.

9.0 CONTROL OF CONTAMINATION AND MATERIAL STOCKPILE

9.1 BASELINE

9.1.1 The site is located within the Leconfield Industrial Estate and consists of hardstanding, unused buildings and areas of grassland, scrub and woodland. The site is not located within a groundwater Source Protection Zone, however, a preliminary desk study has revealed that the site may have been exposed to contamination, with iron works waste, railway contamination, construction /demolition waste and possibly oils or fuel from vehicle spills the most likely source. Asbestos may also be present on the site from previous building cladding and roofing.

9.1.2 The indicative radon map indicates that the eastern part of the site lies in an area where between 10% to 30% of homes are estimated to be above the radon action level. As part of development proposals, if new buildings are proposed in the eastern part of the site, radon protection measures will be required[4].

9.2 RELEVANT LEGISLATION AND POLICY

9.2.1 The construction works need to adhere to the following guidance;

- Environmental Good Practice on site, CIRIA C741, 2015; and,
- DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction site.

9.3 RECOMMENDATIONS

9.3.1 Given that the site may have been exposed to contamination and there is a possibility that asbestos may also be present on the site in order to manage any potential effects of contamination, the following measures should be adhered to:

- The construction works will be managed to comply with the necessary standards and consents as identified by the EA and the local authority, and secured through planning condition;
- If during the development works, contamination or risks are encountered, works should cease, and CC should be notified.
- Areas where contamination may occur will be provided with suitable pollution protection. Storage areas and vehicle refuelling/maintenance areas will be protected by an impervious base, while impermeable bunds of an adequate capacity will be provided around tanks containing potential pollutants;
- Tanks will be located away from manholes and surface water gullies. They must be double-bunded, non-gravity diesel tanks, and a weekly inspection of their surroundings will be undertaken for damage, leaks or spills.
- All fuel and chemical storage would be away (twenty metres minimum) from all watercourses, with oil and fuel storage undertaken in accordance with the Control of Pollution (Oil Storage) (England) Regulations 2001. These will be sited on impervious bases and surrounded by impervious bund walls;
- Construction materials and/or waste will be safely stored within either bunded or hard surfaced areas. Bunded storage areas will be located within the constructor's compound and will be provided for the duration of the works; and,
- All foul and surface water drains will be bunded prior to the start of works.

[4] Geo-Environmental Desk Top Study (2019)

9.3.2 Key risk arises in the use of cement-based materials, which may be stored in the compound or at works locations across the site, hand mixed, and hand applied, poured from a mixer lorry or a mini mixer machine, or sprayed at the point of use. Therefore, concrete requirements will be delivered in mixing lorries and poured at foundation sites, washing out of concrete mixing vehicles will not occur on site, but back at concrete vehicles' maintenance depots.

9.3.3 All construction workers on the site will be briefed on appropriate working practice on contaminated sites and issued with any necessary PPE, including overalls, gloves and dust masks where necessary.

9.3.4 If suspected or unidentified contamination has been found work in the contaminated area shall stop immediately. The contaminated land shall be clearly identified and quarantined to prevent access to the contaminated area. The Contractor will report the incident to the site Manager who shall seek advice from the EA.

9.4 STOCKPILING

9.4.1 Should any stockpiling be required on site, this should be regulated in line with the 'Construction Code of Practice for the Sustainable Use of Soils'. Key recommendations are outlined within the following subsections.

Stockpile Height

9.4.2 The size and height of the stockpile will depend on several factors, including the amount of space available, the nature and composition of the soil, the prevailing weather conditions at the time of stripping and any additional planning conditions associated with the development. Maximum stockpile heights of 3-4m are commonly used for topsoil that can be stripped and stockpiled in a dry state.

9.4.3 Soil moisture and soil consistency (plastic or non-plastic) are major factors when deciding on the size and height of the stockpile, and the method of formation. As a general rule, if the soil is dry (e.g., drier than the plastic limit) when it goes into the stockpile, the vast majority of it should remain dry during storage, and thereby enable dry soil to be excavated and respread at the end of the storage period. Soil in a dry and non-plastic state is less prone to compaction, tends to retain a proportion of its structure, will respread easily and break down into a suitable tilth for landscaping. Any anaerobic soil also usually becomes re-aerated in a matter of days.

9.4.4 Soil stockpiled wet or when plastic in consistency is easily compacted by the weight of soil above it and from the machinery handling it. In a compacted state, soil in the core of the stockpile remains wet and anaerobic for the duration of the storage period, is difficult to handle and respread and does not usually break down into a suitable tilth. A period of further drying and cultivation is then required before the soil becomes re-aerated and acceptable for landscaping.

Stockpile Location and Stability

9.4.5 Soil will have a natural angle of repose of up to 40° depending on texture and moisture content but, if stable stockpiles are to be formed, slope angles will normally need to be less than that. For

stockpiles that are to be grass seeded and maintained, a maximum side slope of 1 in 2 (25°) is appropriate.

Stockpile Protection and Maintenance

9.4.6 Once the stockpile has been completed the area will be cordoned off with secure fencing to prevent any disturbance or contamination by other construction activities. If the soil is to be stockpiled for more than six months, the surface of the stockpiles should be seeded with a grass/clover mix to minimise soil erosion and to help reduce infestation by nuisance weeds that might spread seed onto adjacent land.

9.4.7 Management of weeds that appear will be undertaken during the summer months, either by spraying to kill them or by mowing or strimming to prevent their seeds being shed.

10.0 STORAGE OF CHEMICALS & WATER POLLUTION PREVENTION

10.1 BASELINE

10.1.1 From a desktop review it has been established:

- The site is located within Flood Zone 1 which is deemed to be at low risk of fluvial flooding.
- There are no active surface water abstractions at or within 250m of the site.
- There are two discharge consents operated by United Utilities Water Ltd relating to the discharge of public sewage into Nor Beck[5] from a storm tank.
- A pollution incident has been recorded offsite (but within 250m of the site) where a minor incident occurred concerning oils/petrol polluting freshwater river/stream.
- The site is currently served by wastewater systems through an existing network of private separate sewers. Existing surface water drains discharge to the existing culverted Nor Beck watercourse and the existing foul water drains discharge to the existing United Utilities combined sewer to the west of site[6].
- The site is located on soluble rock and is classified as having a medium-low groundwater vulnerability .

10.2 RELEVANT LEGISLATION AND POLICY

10.2.1 Any works which have the potential to affect land and watercourses need to adhere to the following environmental legislation:

- Control of Substances of Health Regulations 2002 (COSHH). Water Resources Act (1991) section 85;
- The Water Act (2003);

[5] Nor Beck is a small watercourse running to the northwest of the site.
[6] SUDs Management Plan undertaken by Billinghurst George and Partners.

- Water Framework Directive (WFD);
- The Groundwater (England and Wales) Regulations (2009);
- The Environmental Permitting Regulations (2010);
- CIRIA guidance 532 Control of water pollution from construction sites: Guidance for consultants and contractors;
- CIRIA guidance 515 Groundwater Control – Design and Practice;
- Environment Agency's 'Working at construction and demolition sites': PPG 6 Pollution Prevention Guidelines;
- Land Drainage Act (1991);
- Land Drainage Byelaws; and
- Flood and Water Management Act (2010)

10.3 RECOMMENDATIONS

10.3.1 The Principal Contractor will be required to develop detailed method statements for key aspects of work and handling of materials/liquids which have a potential for environmental impact. These should encompass proposals for the control of pollution, together with emergency response plans. The Principal Contractor will be required to observe and adhere to relevant legislation and guidelines. Chemicals, including fuel and oil, will be stored in accordance with pollution prevention guidelines and standard planning conditions.

10.3.2 The Principal Contractor will be responsible of providing suitable PPE to the staff, and construction workers must wear it when dealing with spillages.

10.3.3 The water from the cleanliness of roads and wheel washing facilities will be controlled as outlined in Section 6.0. Moreover, any silt spillage detected during the construction works, will be treated as a priority to stop the flow and contain the spill before it enters surface water drains or watercourses/soil.

10.3.4 Plant and equipment will be stored in areas which are less susceptible to pollution and should be stored on a hardstanding base within the secure compound as agreed by the Principal Contractor. A storage area will be located in the compound location as identified in Sections 4 and 6 and will be provided for the duration of the construction period for the storage of inert construction materials. Any hazardous materials will be stored in a secure area within the construction compound on a base impermeable to the material stored and be of 110% capacity of the liquids being stored in line with best practice.

10.3.5 Access to the hazardous storage area will be restricted to those people who are authorised to do so and have adequate training. Plant and equipment will be stored in the areas within the compound not occupied by the hazardous material storage area. Plant equipment will be refuelled in designated areas within the compound. Material storage will be restricted and

limited to the area adjacent to the loading area. No materials will be stored outside of the site compound.

10.3.6 Immobile plant, fuels, oils and chemicals will be stood on impervious drip trays or be secured/locked in appropriately bunded areas (at 110% of volume). Refuelling operations will be carried out within a designated construction site compound remote from surface drainage systems. Leaking or empty drums will be removed from site at once.

10.3.1 Regular visual inspections and monitoring of nearby water courses shall be undertaken during the construction phase to provide an early indication of any potential contamination releases to controlled waters. All wastewater and site discharges will only be permitted where the effluent quality and discharge location is acceptable to the relevant authorities.

10.3.2 Procedures for monitoring groundwater levels and quality at abstraction boreholes will be agreed to and implemented where appropriate.

10.3.3 Pollution prevention equipment will be kept in the construction area and procedures for use put in place. The Contractor will be required to keep sufficient spill kits on Site at all times so that one can be deployed to any part of the construction Site within 15 minutes.

10.3.4 Installation of silt traps within the channel during installation of headwall.

10.3.5 All material generated by the vegetation clearance; manhole and headwall construction will be disposed of off-site by the Contractor.

10.3.6 Debris will not be dropped directly onto the carriageway. The Contractor will provide all necessary pavement protection measures for the duration of the works.

10.3.7 Any such roads or accesses used by vehicles engaged in the works or any new roads which are part of the works and which are used by traffic will be kept clean and clear of all dirt, mud or other materials dropped by said vehicles at all times. The Contractor will provide, maintain and keep available at all times, equipment as may be necessary to keep such ways clean.

10.3.8 A design and implementation of an emergency incident strategy will be in place.

10.3.9 Spill kits will be made available at all times (including the risk of spillage from any petrol powered machinery that may be used).

10.3.10 Signage in contractors' compounds relating to sensitivity of the designated site for nature conservation. The exact location of the compound is yet to be agreed but will be located in close proximity to the works area (and therefore will not result in any direct or indirect effect upon the designated site).

10.3.11 A toolbox talk will be delivered to contractors in respect to the importance of water supply, waterbodies and use of pollution control packs.

11.0 CONTROL OF WASTE

11.1 BASELINE

11.1.1 Waste will be produced during the construction phases of the Proposed Development.

11.2 RELEVANT LEGISLATION AND GUIDANCE

11.2.1 Works which have the potential to generate waste must demonstrate a 'Duty of Care' in relation to the effective management of construction, demolition and excavation (CDE) waste.

11.2.2 Key legislation includes, but is not limited to:

- EU Landfill Directive (Directive 1999/31/EC on the landfill of waste) (as amended by 2003/33/EC)
- EU Waste Framework Directive (Directive 2008/98/EC on waste)
- The Clean Neighbourhoods and Environment Act 2005, Chapter 16
- Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675) as amended by The Environmental Permitting (England and Wales) (Amendment) Regulations 2012, 2014 and 2015
- The Hazardous Waste (England and Wales) Regulations 2009 and amendment SI 507
- Waste (England and Wales) Regulations 2011 and 2012 amendment
- Environmental Protection Act 1990 (section 34, Duty of Care)
- List of Wastes Regulations (LoWR) 2005

11.3 MITIGATION MEASURES

11.3.1 The Principal Contractor will be required to develop detailed method statements for key aspects of work which have a potential for environmental impact. These should encompass proposals for the control of pollution, together with emergency response plans. The Principal Contractor will be required to observe and adhere to relevant legislation and guidelines.

11.3.2 The contractor should develop a Construction Waste Management Strategy detailing amounts of waste expected to be generated as well as where waste will be stored prior to removal. The generation of construction waste should, as the first priority, be avoided wherever practicable. When waste is generated, it should be sent for reuse and

recovery, in preference to disposal[7]. Wherever practical, uncontaminated spoil should be reused on site for backfill and the regrading of excavations.

11.3.3 Any waste sent for disposal should be directed to sites which hold valid waste management licenses issued by the EA and which are authorised to accept the type and quantity of waste. Transport of wastes should be minimised by the selection of local disposal sites where available. All contractors used for transport of waste should be registered and licensed haulage contractors following 'Duty of Care'. No disposal of waste by dumping or open burning should be permitted on site. All waste should be subject to controlled collection and storage on site.

11.3.4 Plant and materials shall be stored within the secure compound as agreed by the Principal Contractor.

11.3.5 Additional waste segregation and storage strategies include:

- Segregate different types of waste as they are generated using different skips/heaps where practical;
- Ensure storage areas are safe, secure and weatherproof and where relevant, apply for environmental permits or exemptions before waste is stored; and
- Ensure materials that have the potential to cause dust impacts are suitably located and managed to avoid dust effects.

11.3.6 A toolbox talk will be delivered to contractors and sub-contractors covering the environmental effects of waste, the legal requirements for the management of waste, specific actions as to how to minimise waste and details of how waste should be segregated and managed on-site.

11.3.7 Specialist waste training will be given to those responsible for the management of site waste and this training will be in line with the requirements and environmental risks associated with their role and responsibilities.

12.0 PROTECTION OF BIODIVERSITY

12.1 BASELINE

12.1.1 The site predominantly comprises areas of Open Mosaic on Previously Developed Land, hardstanding, sparsely vegetated land with areas of wet woodland, broadleaved woodland, grassland, scrub, standing water, and built liner feature. The closest sensitive area to the site is the River Ehen SAC 1.2 km south east from site which is also a SSSI. There are also seven local wildlife sites within a 2 km radius of the site.

12.1.2 The surroundings of the site include commercial, agricultural and residential uses.

[7] The geo-environmental report mentions that there is a licensed waste management facility present on the Industrial Estate.

12.1.3 The River Ehen has ecological importance and supports freshwater mussel population. There are a number of local wildlife sites within a 2 km radius of the site, including:

- Rheda South Park (0.7km northeast of the Site) – designated as a Country Wildlife Site (CWS);
- Birkhouse Pond (0.9km east of the Site) – designated as a Country Wildlife Site (CWS);
- Parkside Pond (1.2km east of the Site) – designated as a Country Wildlife Site (CWS);
- Dub Beck (1.7km southeast of the Site) – designated as a Country Wildlife Site (CWS) and Site of Invertebrate Significance;
- Keekle River (0.5km west of the Site) – designated as a Site of Invertebrate Significance; and
- Weddicar Hall (1.4km southeast of the Site) – designated as a Site of Invertebrate Significance

12.1.4 Ecological surveys undertaken to date have recorded the presence and/ or suitability for a variety of protected species which must be considered during the works, which include:

- common amphibians and reptiles
- bats
- badgers
- red squirrel
- invertebrates

12.1.5 Invasive plant species have also been recorded within the site.

12.2 RELEVANT LEGISLATION AND GUIDANCE

12.2.1 Works which have the potential to affect biodiversity must have regard for the following environmental legislation:

- The Conservation of Habitats and Species Regulations 2017 (as amended)[8];
- The Wildlife and Countryside Act 1981 (as amended)[9];
- British Standards Institution (2013) 42020: 2013 ' Biodiversity – Code of Practice for Planning and Development[10]
- British Standards Institution (2012). B2 5837: 2012 'Tree work in relation to design, demolition and construction – Recommendations'[11];

[8] https://www.legislation.gov.uk/uksi/2017/1012/contents
[9] https://www.legislation.gov.uk/ukpga/1981/69/contents
[10] CD 3.20 BSI Biodiversity Code of Practi...020 2013 - The Wildlife Trusts pdf.pdf
[11] https://www.ashford.gov.uk/media/ecwa1hny/cd-5-7-bs5837-2012.pdf

- British Standards Institution (2010). B2 3998: 2010 'Tree work. Recommendations'[12];
- UK Forestry Standard Guidelines – Forests and Water 2011[13]; and
- Natural Environment and Rural Communities (NERC) Act 2006[14].

12.2.2 Works also need to adhere to the following guidance:

- The National Planning Policy Framework (NPPF) (2024)[15]; and
- British Standards (BS EN 12464-2:2014) and Institute of Lighting Professionals (ILP) guidance[16].

12.2.3 Construction works must also adhere to measures contained with the Reasonable Avoidance Measures Report (RAMs) (Tetra Tech, 2024).

12.3 MITIGATION MEASURES

12.3.1 The construction works will be carried out in accordance with the mitigation measures recommended in the Reasonable Avoidance Measures (RAMs) report (Tetra Tech, 2024) to minimise the risks the works pose to any ecological receptors known or with the potential to be present in line with relevant legislation and policy identified above.

12.3.2 The ECoW will undertake a walkover (to an appropriate buffer around the proposed works) 3 months prior to the start of works in order to identify any additional ecological constraints which may be present, and to micro-site working areas where appropriate.

12.3.3 The site supports habitat of high ecological value including wet woodland and open mosaic habitat and any of this habitat type which is retained must have an appropriate buffer, which will be checked by the ECoW.

12.3.1 The following species may be present on site and should be considered during the site clearance and construction phases of the works:

- **Amphibians and reptiles –** Removal of vegetation and of places of shelter/hibernation features will be undertaken outside of the reptile hibernating period (October to February inclusive), during periods of warm, dry weather. Where this is not possible, vegetation will be cut to the ground (to remove potential bird nesting habitat), but any roots will remain intact until hibernation is complete. The root system of vegetation will then be removed once the reptile hibernation season is over. The ECoW will finger-tip search longer grasslands prior to strimming and check spoil mounds.
- **Bats** – Although there is no suitable roosting habitat within the site, some habitats are valuable for commuting and foraging bats (woodland, grassland, scrub and open mosaic). Sensitive lighting is required alongside the sensitive features such as the woodland as bats

[12] https://www.westberks.gov.uk/media/50570/CD17-2-BS3998-2010-Tree-Work-Recommendations/pdf/CD17.2_BS3998.2010_Tree_Work__Recommendations.pdf?m=637552246418800000
[13] https://cdn.forestresearch.gov.uk/2006/03/ukfs_water_fcgl007.pdf
[14] https://www.legislation.gov.uk/ukpga/2006/16/contents
[15] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[16] https://www.scambs.gov.uk/media/24401/cd137-bs-en-12464-2-outdoor-work-places-2014.pdf

use these dark corridors for moving through the landscape.. No works should take place after sunset.

- **Badger** - there is suitable habitat present on site and a pre-works check will be undertaken 3 months prior to works commencing. If any badger setts are identified during the check, then a licence may be required from Natural England.
- **Red squirrel** – although the site is unlikely to support red squirrel, there is suitable habitat within the wider CMIQ site and therefore a precautionary check of suitable habitat will be undertaken 3 months prior to works.
- **Nesting Birds** – For any vegetation clearance in the nesting season (March to September inclusive) the ECoW will check for nesting birds within 48 hours before any vegetation is cleared. If nesting birds are identified, works in the vicinity of the nest (estimated to be a 10m standoff) will cease until the young have fledged.
- **Invertebrates** - including cinnabar moth and dingy skipper. The ECoW will check for these species along with any foodplants and translocate to a suitable receptor area within the wider site.
- **Invasive species** (e.g. wall cotoneaster) -any presence of invasive species must be reported to the Biodiversity Champion and measures contained in relevant Defra and Environment Agency best practice guidance on the control and removal of invasive weed species will be implemented where appropriate.

12.3.2 It is recommended that the below is monitored by the Biodiversity Champion appointed:

- Contractors must be fully aware of the extent of working area, ensuring that all works are contained within the footprint agreed with the ECoW;
- Contractors should be aware that protected species such as amphibians and reptiles may be found sheltering amongst refugia such as rubble, wood, spoil, chippings or rubbish. As a result, all machinery, materials and chemicals should be stored safely and securely to prevent foraging and commuting animals coming in to contact with these, and to prevent spillage of chemicals;
- Contractors should be aware of Invasive Non-Native Species on site and adhere to the appropriate buffer depending on the species, detailed in the RAMs report. Giant hogweed has been identified on site poses a risk to health, therefore health and safety considerations are required as part of the eradication process;
- Contractors should design and implement a site waste management plan in order to avoid causing death or injury to wildlife (refer to Section 11 for details on this plan);
- All excavations should be either covered at the end of the day (preferable) to prevent access and if this is not possible, a means of egress (i.e. a wooden plank or soil ramp) shall be provided to ensure that anything that may access these excavations (e.g. badgers) has a means of escape;

- All pipes over 200mm in diameter should be capped at night, to prevent animals, such as badgers, from entering;
- Any areas of loose spoil must be fully compacted, to ensure no cracks or crevices remain;
- A safe system for the correct storage of materials/chemicals on site should be implemented to ensure that materials are stored in a suitable manner as to avoid potential impacts on vegetation and fauna. This is particularly important with liquids/chemicals, which should not be stored near vegetated areas but stored on an impermeable base and used in strict accordance with manufactures instructions with appropriate spill kits provided and site personnel appropriately trained to use these;
- Daily checks of any excavations should be made by contractors prior to commencing work to ensure that no animals have become trapped in the excavations. Should a trapped protected/notable species be found within the works area, the ecologist should be immediately contacted for advice;
- Fuel should be stored in appropriate capacity bunded tanks/bowsers, and drip trays used beneath equipment such as generators;
- Works should remain as far from all watercourses and waterbodies as is possible, with no works occurring within ~10m of watercourses unless agreed in advance with the ECoW;
- Appropriate best-practice pollution prevention and run-off control measures should be employed;
- Any obvious mammal trails through the site should remain clear of obstruction;
- In the unlikely event that a protected species is found, then the Principal Contractor's Site Manager will contact the Project Ecologist for advice, and all works in that area would cease. The Principal Contractor Site Manager will then await further instruction from the ecologist before proceeding with works. Although these measures are necessary specifically in relation to protected and/or notable species, contractors should treat any animals with similar due care and attention.
- Construction works will avoid the unnecessary removal of trees and vegetation;
- An arboriculturist will assess and oversee works to retained trees, as required;
- Any tree felling will be carried out taking appropriate consideration of the UK Forestry Standard Guidelines – Forests and Water 2011 to mitigate risks from felling areas of woodland and trees on the freshwater environment. Any tree felling operations must consider the legal protection given to roosting bats and breeding birds;
- The contractor will provide a programme for undertaking any planting works required. Planting and other landscape measures will be implemented as early as is reasonably practicable, and within the appropriate planting season, where there is no conflict with construction activities or other requirements;

- Relevant local authorities and adjacent landowners will be consulted, as appropriate, regarding the landscape and planting proposals;
- A specialist contractor will be employed to develop a bespoke treatment strategy for controlling invasive species (such as cotoneaster species) identified on site; and
- Wash-down areas should be provided to clean boots and tools as soon as contractors leave the area in order to prevent further spread of any invasive species.

12.3.3 In advance of works commencing (including site clearance and preparatory works) an ECoW will provide a toolbox talk to contractors and sub-contractors covering the mitigation measures that need to be adhered to in order to safeguard ecological receptors as detailed within the RAMs report (Tetra Tech, 2024).

12.3.4 Toolbox talks and briefings will be required so that construction workers are fully aware of the environmental sensitivities of the development site, including both European and nationally designated sites as well as legally protected species.

12.3.5 Toolbox talks will provide a basic overview of the ecological constraints and legal protection granted to the protected species / other species of conservation concern present on site that may be encountered during the works.

12.3.6 Toolbox talks will be provided in advance of works commencing (including site clearance and preparatory works) and will be provided by the ECoW and given to contractors and sub-contractors. The talks will specifically include:

- Detailing the RAMS required such as supervision of strimming and dismantling of refugia to be undertaken by ECoW prior to site clearance;
- Identification of badger signs;
- Identification of bats;
- Identification of red squirrel;
- Procedure if animals are found;
- Identification of cinnabar and dingy skipper caterpillars and their foodplant;
- Biosecurity measures (e.g. skin irritation associated with cinnabar) and alerting the contractors to any invasive species identified on site and their buffer zones. The toolbox talks will cover the mitigation measures that need to be adhered to in order to safeguard ecological receptors as detailed within the RAM's Report.

12.3.7 The toolbox talk will be repeated as required through the work programme.

13.0 ARCHAEOLOGY AND HERITAGE

13.1 BASELINE

13.1.1 There are no designated heritage assets within the site. There are eight Grade II Listed buildings within the study area, concentrated in Cleator Moor, including Cleator Moor War Memorial (1454239) and the Grade II Listed Church of St John Evangelist (1336035), both 0.2km from the site. One Conservation Area also lies within the study area.

13.1.2 One non-designated asset encompasses the entire site: Cleator Moor Haematite Ironworks (12383). The Cumbria Historic Environment Record only has a brief description of the asset, stating the building has now disappeared.

13.2 RELEVANT LEGISLATION AND GUIDANCE

13.2.1 The construction works need to manage the impact of construction works on the site in accordance with accepted industry practice, considering the relevant sections of the National Planning Policy Framework (NPPF) (2024) and local development plans. Mitigation was undertaken in accordance with the Chartered Institute for Archaeologist's 'Standard and guidance for archaeological field evaluation' (2020).

13.3 MITIGATION MEASURES

13.3.1 Construction works will be carried out in accordance with the relevant legislation and policy identified above. In addition to these, the following mitigation measures have been implemented to avoid, reduce and mitigate impacts on archaeological remains and cultural heritage:

- Consultation has been undertaken with Cumberland Council, where it was determined that, in accordance with information provided on ground levels, two targeted trenches were required prior to construction.
- A Written Scheme of Investigation was agreed for these works with the Cumberland Archaeologist. This detailed the principles, standards, methods and techniques to be employed for the trial trench evaluation works.
- Two trenches were excavated by Oxford Archaeology in June 2025, and no natural geology was observed at depths of up to 2m (Oxford Archaeology, 2025).
- Further consultation was undertaken with the Cumberland Council about the results of the trial trench evaluation, who advised that the final design plans should be compared with historic mapping and the results of the evaluation survey to determine whether the remains of Cleator Moor Iron Works Cleator Moor Haematite Ironworks (12383) would be impacted, and based on this comparison whether a programme of targeted archaeological monitoring and recording would be required (*pers comm* 26.06.2025).

- Contractors will be advised that whilst carrying out ground-breaking activities such as piling, trenching, tunnelling, etc., if items or materials are encountered not in keeping with the expected nature of the site soils that may represent site heritage, work is to be stopped; and
- A suitably qualified organisation or person will be used to undertake all cultural heritage works if a discovery is made on the Site.

13.3.2 The Applicant will consult with the Cumberland Council Archaeologist as to the appropriate procedures to implement to avoid damage to important structures and/or archaeological remains should a discovery on site be made.

14.0 CONTROL OF LIGHTING

14.1 BASELINE

14.1.1 The site is situated within the Leconfield Industrial Estate and personnel are working in industries located within the Estate. There are therefore existing sources of lighting already present.

14.2 RELEVANT LEGISTATION AND GUIDANCE

14.2.1 The construction works need to adhere to the Lighting Engineers' guidance notes for the reduction of light pollution and the provisions of BS 5489, Code of Practice for the Design of Road Lighting.

14.3 MITIGATION MEASURES

14.3.1 The construction works will generally be carried out within daylight hours within the permitted working hours; as such the requirement for temporary construction lighting should be limited by this as far as is practicable. Any construction works will be carried out in accordance with best practice guidelines and the relevant legislation and policy identified above.

14.3.2 There may be occasions where temporary lighting is required for occasional night time working or during the darker winter months and therefore the following mitigation measures will be implemented:

- The use of construction lighting outside normal working hours should be limited and kept to the minimum necessary for workforce, public safety and/or security;
- No artificial lighting should be placed in locations where it will cause light spillage on habitat corridors which are likely to be used by wildlife;
- Any temporary lighting used should be installed such that illumination is minimised and directional so that it is focussed on the specific location/s where it is required; and,
- Any temporary lighting should be switched off at all times when not required.

15.0 SUMMARY AND CONCLUSIONS

15.1.1 This document sets out the CEMP for the site that the Principal Contractor must adhere to when undertaking construction works. A description of the planned works and the recommended environmental mitigation measures are set out, although it should be noted that this document is a live document. It will be kept on site for compliance and will be constantly reviewed by the Principal Contractor (i.e., every 6 months as a minimum) and updated following significant changes to the works, the working environment and/or as a result of an environmental incident.

15.1.2 It will be kept on site for compliance and will also be constantly reviewed by the Principal Contractor (i.e., every 6 months as a minimum) and updated following significant changes to the works, the working environment and/or as a result of an environmental incident.

15.1.3 The following people will act as the key contacts for the development works which are to be carried out and they will be the main point of contact for any complaints which are received during the programme of works:

- Client: Cumberland Council
- Principal Contractor: Morgan Sindall
- Site Manager: Greg Slater, Morgan Sindall.

APPENDIX A – TOOLBOX SIGN IN

Name	Date	Signature