

Stubsgill Farm, Turbine Repowering

Construction Environmental Management Plan

Prepared for



Constantine Wind Energy Storage

September 2025 3369-01-CEMP-001

Document Control

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Well House Barns, Chester Road, Bretton, Chester, CH4 0DH 1st Floor, Barfield House, Alderley Road, Wilmslow, SK9 1PL Maling Exchange, Studio 307, Hoults Yard, Walker Road, Newcastle Upon Tyne, NE6 2HL

T: 0344 8700 007 enquiries@axis.co.uk www.axis.co.uk

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1.0 INTRODUCTION

1.1 Introduction

- 1.1.1 Axis has been commissioned by Constantine Wind Energy Limited ('CWE') to prepare this Construction Environmental Management Plan ('CEMP') for the consented repowering of an existing wind turbine site located at Stubsgill Farm, Distington, Workington ('the Site'). This process is known as repowering. The Site lies wholly within the administrative area of Cumberland Council (CC) as the Planning Authority.
- 1.1.2 The location of the Site is shown on Figure 1.

1.2 Project Summary

1.2.1 Planning permission was granted on 25th June 2025 for the Stubsgill Turbine Repowering (planning application reference 4/24/2302/0F1). The Stubsgill Turbine Repowering will be capable of producing 250kW of renewable electricity, utilising existing grid connections to help support efforts to reach net zero.

1.3 **CEMP Planning Condition**

1.3.1 Planning Condition 16 included in the Stubsgill Turbine Repower planning permission decision notice, requires a Construction Environmental Management Plan (CEMP) to be submitted and approved by Cumberland Council, prior to any works commencing. For the avoidance of doubt, Condition 16 states:

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

The CEMP shall include details of:

- Storage of plant and materials used in constructing the development;
- The erection and maintenance of security hoarding;
- Measures to control the emission of dust and dirt during construction;
- Measures to avoid and minimise the risk of a pollution event;
- A scheme for recycling/disposing of waste resulting from construction works;
- A procedure to mitigate noise and vibration from the construction as well as taking into account noise from vehicles, deliveries.

- Measures to reduce adverse impacts on residential properties from construction compounds including visual impact, noise, and light pollution.
- A written procedure for dealing with complaints regarding the construction.

The development hereby approved shall be carried out in accordance with the approved CEMP".

2.0 EXISTING SITE LOCATION

- 2.1.1 The Site is located to the north of Stubsgill Farm, off an unnamed road and situated circa 1km to the east of Distington. The OS Grid Reference for the existing wind turbine is NY 01884, 23328.
- 2.1.2 The Site comprises an area of land within an agricultural field that has undergone a degree of rewilding due to a lack of cultivation. It is situated within a wider area of agricultural land, which includes pockets of woodland. The majority of land is classed as land capable of producing moderate to high yields of a narrow range of crops.
- 2.1.3 Access to the Site is via a purpose-built access track, consented under planning permission ref: 4/13/2173/0F1. This access is formed directly from Stubsgill Farm.
- 2.1.4 Discounting Stubsgill Farm, the nearest residential dwelling is at Kelmore Hill Farm, which is approximately 460m to the northeast of the existing wind turbine. The next nearest residential property is at Dyonhall Farm, approximately 445m southeast of the Site.
- 2.1.5 Discounting Stubsgill Farm, the nearest residential property is Dyonhill Farm, which is located approximately 445 metres to the southeast of the existing wind turbine. The next nearest residential property is Kelmore Hill Farm, which is located approximately 460 m to the northeast of the Site.
- 2.1.6 The Site is not located within any designated site for nature conservation, cultural heritage or landscape purposes and there are no statutory or non-statutory designations within 2km of the site. The closest designated ecological asset is the River Derwent SSSI located circa 4.5km east of the Site.
- 2.1.7 In terms of heritage assets, there is a Grade II Listed Building approximately 380m to the south of the Site in the form of "Stubsgill Farmhouse, Area Wall and Gate Piers, and Byre". There are a number of further Listed Buildings in the area, with the closest being the Grade II listed "Distington War Memorial" approximately 1.4km to the west.

2.1.8 A review of flood data available from GOV.UK's Flood Map¹ for Planning illustrates that the Site is located within Flood Zone 1 and is therefore not at risk of any surface water, coastal or river flooding.

¹ <u>https://flood-map-for-planning.service.gov.uk/</u>

3.0 DESCRIPTION OF WORKS

3.1 Construction Programme

3.1.1 Table 1 below provides an overview of the approved development's construction timetable, with details of each stage then provided thereafter.

Table 1 - Construction Timetable

Task	WO	W1	W3	W4	W4	W5	W6	W7	W8	W9
Conditions discharged										
Civils works										
Foundation cure										
Electrical works										
Existing wind turbine decommissioning										
New turbine installation										
New turbine commissioning										
Handover to client										

3.2 Construction Works

Conditions Discharged

3.2.1 Assumed date all conditions are discharged, and works can commence onsite. This time schedule will allow decommissioning and installation works to be completed before the higher wind speeds associated with September.

Civils Works

3.2.2 Civils works will commence with the excavation of the new wind turbine foundation hole. With these complete, efforts will concentrate on steel tying and concrete pour. Whilst the foundation is curing the new hardstanding area will be created, cable trenches dug, cables laid, and access improvements progressed. Foundations Cure

3.2.3 The schedule allows for a 4 week concrete cure. This is dependent on weather conditions.

Electrical Works

3.2.4 The electrical works including laying and connecting of cables between the new turbine and existing substation, installation of a new earthing ring around the new turbine foundation and modification of the existing switch gear housed in the substation.

Existing Wind Turbine Decommissioning

3.2.5 Decommissioning of the existing Windflow turbine is likely to take only 3 days if weather conditions are suitable.

New Turbine Installation

3.2.6 Likely to take 3 days to install, weather permitting, and an additional 3 days to commission.

Handover to Client

3.2.7 Site inspection by client and all contractors involved to ensure project is completed to specification.

Construction Hours

3.2.8 Construction would generally be limited to 07.00 to 19.00 Monday to Friday and 07.00 to 13.00 Saturday (with no work on Sundays or Bank Holidays).

3.3 Operational Works

Foundations

3.3.1 The location of the foundation pad for the replacement turbine is shown on Figure 2. The final design of the foundation and reinforcement would be completed following ground investigations and detailed engineering design prior to construction.

Access Track

- 3.3.2 Access for construction and maintenance of the replacement turbine would be via a new access track from the main road to the north, which is included as part of the planning application.
- 3.3.3 The proposed access arrangements are shown on Figure 2.

Crane Hard Standing / Lay Down Areas

- 3.3.4 An area of temporary trackway will be required, adjacent to the existing and proposed turbine pads and current access track, to accommodate removal and erection works. This area requires a hard standing to facilitate the mobile cranes and include a laydown area for the storage of turbine components. The temporary trackway area proposed for the mobile cranes and laydown of turbine components is illustrated on Figure 2.
- 3.3.5 The replacement turbine would be erected using two mobile crane units to lift the tower sections, nacelle and rotor components into position. It is anticipated that it would take approximately six weeks to complete the installation and commissioning of the turbine, after which the cranes would be removed from site.
- 3.3.6 Given the current makeup of the construction site, there will be no need for any separate construction compound beyond the extended crane pad.

Switchgear Container and Associated Cabling

- 3.3.7 The replacement turbine will make use of the switchgear building and cabling installed to serve the existing turbine. The switchgear container is located immediately adjacent to the turbine base. The container houses the switch gear, transformer and generation meters required for the operation of the proposed turbine. The location of the retained switchgear container is highlighted in Figure 2.
- 3.3.8 The Site is connected to the Mainland 11kv grid by a mix of overhead line and underground cabling.

Aviation Lighting

3.3.9 As the proposed turbine is under 150m tall, there is no statutory requirement for aviation lighting to be incorporated within the turbine design. However, infra-red lighting will be included as an incorporated design measure to further reduce any

risk to aviation. This design has been approved through the discharge of Condition 10 of the Decision Notice, which was discharged by CC on [insert date].

Turbine Removal

- 3.3.10 The existing turbine will be removed in a controlled manner in a reverse sequence to that of installation. In summary this process would include:
 - i) Locating and securing of mobile crane units on new foundation pad.
 - ii) Removal of turbine blades.
 - iii) Removal of blade hub.
 - iv) Removal of nacelle.
 - v) Modular deconstruction of turbine tower.
 - vi) Transportation of components off-site.

Turbine Delivery

3.3.11 The construction site can be accessed by use of local roads by HGVs capable of carrying the turbine blades used for construction. The access road has similarly been designed so as to accommodate these HGVs.

Traffic Generation

- 3.3.12 During construction of the replacement turbine, traffic will consist of the following:
 - i) Site Staff: 4 No. cars/light vans per day throughout construction period.
 - ii) **Foundations**: Excavator delivery and removal on standard low loader, 3 No. HGV movements for delivery of steel reinforcement and anchor cage, approximately 26 No. concrete vehicle movements.
 - iii) **Turbine delivery/installation**: Two mobile cranes (approximately 90t tail crane and 300t main crane), requiring 5 No. HGV movements for cranes and ancillary crane plant. Subject to the specific model of turbine procured, the turbine will be delivered to site in approximately 7 HGV/abnormal loads with approximate dimensions (L x W x H) as follows:
 - a. HGV 1-Blades (27m x 2.5m x 3m).
 - b. HGV 2-Hub & Nacelle (16.5m x 2.5m x 4.0m).
 - c. HGV 3-Top Tower (25m x 2.8m x 4.0m).
 - d. HGV 4-Bottom Tower (23m x 3.4m x 4.5m).

- e. HGV 5-Tower Anchor (8m x 2.5m x 1.6m).
- f. HGV 6 & 7-Converter Cabinets & Tools (16.5m x 2.5m x 4.0m).
- 3.3.13 The removal of the existing turbine and deliveries associated with the new turbine will be managed in a way to minimise vehicle movements where possible, so that delivery vehicles can be loaded with elements of the existing turbine for the return journey. This will reduce the overall number of vehicle trips required for replacing the turbine. However, worst case is that the existing turbine is removed from site in a similar way to the delivery schedule outlined above.

4.0 SITE ENVIRONMENTAL MANAGEMENT STRUCTURE

4.1 Project Management Organisational Structure

4.1.1 In conjunction with CWE, the Construction Contractor shall operate a Project Management Organisational structure for the construction and operation of the Stubsgill Turbine Repowering as follows:

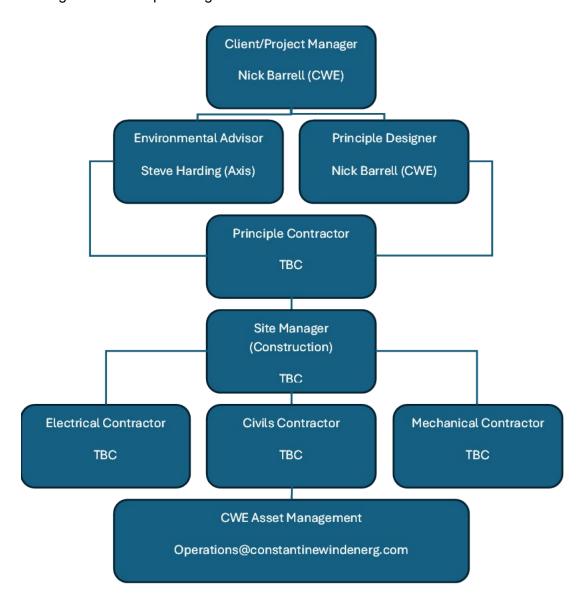


Image 1 - Project Management Organisational Structure

4.2 Key roles and responsibilities

Client/Project Manager - Nick Barrell, CWE

4.2.1 Responsibilities:

- Principle contractors and principle designers have been selected with due regard to Environmental considerations and that they are issued with this CEMP as well as other related environmental documentation.
- ii) Making suitable arrangements for managing the project
- iii) Ensuring Welfare is provided
- iv) Making sure the principle designer and contractor comply with their CDM duties
- v) Ensure the construction phase plan is provided
- vi) Ensure the health and safety file is prepared
- vii) Keep the health and safety file, and pass it onto any future owner.

Principle Designer - Nick Barrell, CWE

4.2.2 Responsibilities:

- i) Plan, manage and monitor the pre-construction phase
- ii) Coordinate health and safety during the pre-construction phase
- iii) Identify and eliminate or control risks to anyone constructing, maintaining or using the designed structure
- iv) Ensure all designers comply with their duties
- v) Coordinate cooperation between the team with the client, the principal designer and each other
- vi) Provide pre-construction information, including this CEMP to designers and contractors
- vii) Liaise with the principal contractor and share information
- viii) Prepare the health and safety file

Environmental Advisor – Steve Harding, Axis

4.2.3 Responsibilities:

- Reviewing and assessing current environmental practices against current regulations and laws
- ii) Visiting sites as part of continuous monitoring
- iii) Advising on environmental risks for the project
- iv) Reporting non-compliance
- v) Leading on environmental accidents

Principle Contractor – [TBC]

4.2.4 Responsibilities:

- i) Plan, manage and monitor the construction phase.
- ii) Coordinate health and safety during the construction phase
- iii) Ensure contractors comply with legal requirements for health and safety
- iv) Ensure all contractor adhere to this control measure contained within this CEMP
- v) Organise cooperation between contractors
- vi) Enforce compliance with the construction phase plan
- vii) Provide a suitable site induction
- viii) Prevent unauthorised access
- ix) Ensure welfare facilities are provided
- x) Liaise with the principle designer and share information

Site Manager - [TBC]

4.2.5 Responsibilities:

- i) Ensure all necessary safety and environmental inspections have been carried out
- ii) Ensure all necessary safety inspections have been carried out
- iii) Ensure the project is completed in line with CDM and environmental policies
- iv) Communicate effectively with workers
- v) Ensure that all workers are aware of the safety and environmental hazards
- vi) Ensure that workers follow best practices and site rule
- vii) Report back to the client
- viii) Liaise and motivate site staff

Asset Management - Constantine Wind Energy

4.2.6 Responsibilities:

- i) Liaison with CC regarding environmental incidents and complaints
- ii) Ensure that environmental matters are reported to the relevant personnel within CWE and are include on the agendas of relevant meetings.
- iii) Oversee the development of this CEMP during the operational lifetime of the turbine.
- iv) Undertaken regular site inspections to identify any environmental issues associated with operation.

5.0 TRAINING AND COMMUNICATION

5.1 Introduction

- 5.1.1 All persons prior to commencing operations on site shall receive a full safety, health and environmental induction from the Site Manager or a designated deputy.
- 5.1.2 Construction site inductions will cover a range of health, safety and environmental topics. Critical to the inductee's retention is the requirement that the first slide of the induction will cover the main hazards or risks. Inductees will be briefed on the sensitivity of the local environment, including local groundwater and hydrology, habitats and residential receptors, and the subsequent mitigation measures to be deployed on site.
 - i) Store waste within skips
 - ii) Use of visqueen or hard standing areas for the storage of skips and drip trays when using liquids (chemicals, greases, hydrocarbons)
 - iii) Use of double skin bowsers
 - iv) Location(s) of spill kits
 - v) Reporting of spilling or loss of containment to the site manager
- 5.1.3 Visitors to site, after signing in, will receive a visitor's induction unless always accompanied by a previously inducted person who will take responsibility whilst on site. If relevant, the visitor will also be briefed on groundwater sensitivity.

5.2 Toolbox Talks

- 5.2.1 To retain information and maintain standards, toolbox talks will be communicated during morning briefings. It is envisaged that bespoke toolbox talks will be required at appropriate stages of construction relating to:
 - i) Residential receptors the sensitivity of these receptors to noise, odour and visual intrusion
 - ii) Hydrology the importance of groundwater protection and the implications of surface water runoff.
 - iii) Biodiversity highlighting the local biodiversity features that could be susceptible to construction activity
 - iv) Incident Response the procedures to be followed should any site incidents take place.

5.3 Site Rules

- 5.3.1 Site rules will be communicated to all site personnel and visitors at induction and posted on the site notice board.
- 5.3.2 The following rules apply to all persons entering the site to protect groundwater:
 - i) No unauthorised persons are allowed on site.
 - ii) All operatives entering the site for the first time must report to the site office for a visitors or full site SHE induction.
 - iii) All operatives must sign in and out of site each time they enter/exit site.
 - iv) All visitors are to report to the site office and shall sign the visitor's book.
 - v) No unauthorised vehicles shall be allowed on site. Parking in designated areas only. Site plant and transport routes to be specified.
 - vi) All accidents and unsafe situation or occurrences must be reported to the site manager immediately.
 - vii) No plant, materials or material waste shall be removed from the site without the authorisation of the site manager and by authorised waste contractors.
 - viii) Permits for hot works, breaking ground or excavations are required prior to the start of works.
 - ix) Plant and equipment must be operated by authorised and trained persons only.
 - x) No temporary or permanent part of the works shall be damaged or defaced.
 - xi) Relevant test certificates or certificates of thorough examination for plant and equipment shall be submitted to the site manager before use.
 - xii) All instructions and directions of the site manager must be complied with.
 - xiii) Risk assessment and method statement to be strictly complied with.
 - xiv) No smoking on site, except in designated areas.
- 5.3.3 Disciplinary procedure for safety or environmental related breaches on this site consists of verbal and written warnings. Serious breach will be treated as gross misconduct and liable to instant removal from site.

5.4 Responding to Incidents

5.4.1 A site incident response plan will follow these logical steps:

- Assess the spill to establish what has been spilt and what measures (such as PPE) are required to deal with the contents.
- ii) Stop the spill at the source, if safe to do so e.g. lifting container up or blocking the leak, turning equipment off.
- iii) Contain the spill using spill kits e.g. booms, spill mat, granules.
- iv) Protect watercourses, land using spill kits to prevent the spill percolating into the ground.
- v) Clean Up and dispose of waste granules, spill mats into the designated hazardous waste containers.
- vi) Record the spill location and quantity and report to the site manager.

6.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT

6.1 Overview

6.1.1 Good practice measures shall be followed during the construction works to ensure that impacts on the environment are minimised. Specific environmental management measures are set out in the following sections.

6.2 Protection of Water Resources

- 6.2.1 Measures need to be put in place to protect the water environment during the construction period from pollution and other adverse impacts, including changes to flow volume, water levels and quality.
- 6.2.2 The water environment relative to the Site comprises of:
 - i) Dyon Beck.
 - ii) Field drainage ditches.
 - iii) Groundwater.
- 6.2.3 Rainfall and associated surface water run-off during construction works can mobilise and transport pollutants such as sediments, oils, chemicals and other building materials into the water environment, causing harm to plants and animals. Pollution from sediment and other pollutants can come from a number of sources on construction site, these include:
 - i) Direct disturbance of the river bank
 - ii) Run-off from exposed ground and material stockpiles
 - iii) Run-off from roads
 - iv) Wheel washing areas
- 6.2.4 Due to the relatively short construction period (circa 8 weeks) and the low intensity of construction activities anticipated on the Site (due to most components being fabricated offsite), the opportunity for pollutants to enter the surrounding environment will be limited, particularly given the implementation of site mitigation measures identified in Section 5 of this CEMP.
- 6.2.5 Nevertheless, good practice guidance measures are to be taken during the construction phase to ensure that potential pollutant pathways are avoided and that

resultant negative impacts do not occur in the local water environment. Further measures to achieve this will be:

- Any wheel washing facilities will be located to avoid silts and other materials entering the water environment.
- ii) Visual inspections of potential pollutant pathways into the water environment will be carried out by the Site Manager over the course of the construction period.
- iii) Washing out of any equipment used to mix, pour or control the use of concrete will be undertaken using a controlled washout system, which can remove suspended solids and neutralise the pH. This will provide treatment of the water to ensure that the pH has been corrected and all fine particles are removed.
- iv) Stockpiled material will be stored away from field drainage systems to avoid run-off into such locations.
- v) Construction vehicles will not be parked nearby to field drainage systems to avoid petrol/oil pollution run off.
- vi) Any and all hazardous substances will be stored within impermeable, bunded areas/containers, to remove risk of migration to groundwater or to the nearby watercourse/canal.
- 6.2.6 These proposed measures will assist in avoiding or minimising the potential for contaminants and suspended solids to migrate to surface and groundwater and protect water quality of the nearby river and the ecosystem which it supports.

6.3 Noise and Vibration Levels

6.3.1 A noise assessment was submitted as Appendix A to the Planning Statement of the original application. Whilst this focussed on the operational aspects of noise, the assessment identified the closest four residential properties to the Site, which are represented in the table below.

Table 2 - Noise Sensitive Receptors

Property	Grid Reference	Approximate Distance From Turbine
Dyonhill Farm	302101,,522937	445 m
Tithe Barn	302452, 523284	560 m
Kelmore Hill Farm	302226,523609	460 m
Bergandal	301696,523684	410 m
Distington Hall Lodge	301565,523791	560 m

- 6.3.2 Whilst these properties are generally over 0.5 km (with the exception of Dyonhill Farm) from the construction site, construction related noise shall be reduced wherever possible through choice of machinery, ensuring machinery is maintained and operated correctly, ensuring it is switched off when not in use.
- 6.3.3 In all other cases, good practice measures shall be employed to minimise noise during working hours (e.g. not slamming vehicle doors, not shouting during early hours of the morning, and where possible, situating amenity areas away from receptor directions).
- 6.3.4 As part of any toolbox talk on noise sensitivity, construction workers will be briefed on how construction vehicles should be used in proximity to residential properties, such as operating at low engine speed where possible, avoiding use of alarms or sounding horns and avoiding excessive loud communication with co-workers.
- 6.3.5 Access and egress to site will follow the approved Construction Traffic Management Plan to minimise noise and disruption to local residents.
- 6.3.6 Operatives exposed to noise will wear suitable hearing protection in line with the Control of Noise at Work Regulations 2005.
- 6.3.7 The construction site shall operate under restricted working hours to mitigate noise in evenings / night and at weekends, as set out in Section 3.2 of this CEMP.

6.4 Dust Nuisance

- 6.4.1 The generation of dust outside of the site boundary is a potential source of statutory nuisance and can lead to complaints being received. Dust can also have an impact on human health and local ecology.
- 6.4.2 Good environmental practices shall be deployed to control dust emissions and mitigate against any nuisance problems arising. This includes:
 - i) Dampening access roads and areas within the site during warm / dry weather to reduce dust and particulates becoming air-bound. A bowser stored on site and transported to where needed via site plant would likely be used to spray necessary surfaces.
 - ii) Wheel washing facilities onsite would be utilised to minimise the transfer of soil onto the local road network. The anticipated wheel washing facilities would consist of either a drive-over ramp system or jet spray, depending on

the site ground conditions (i.e. if mud is wet it can usually be jet sprayed off, but if it 'clings' to wheels, a ramp system may be required). Hence, the chosen method used would be dependent on the site conditions and the most efficient method would be used.

iii) Use of sheeting to cover soil mounds.

6.5 Lighting

- 6.5.1 Construction works will typically be undertaken in daylight hours, though due to the latitude of the site, and dependent of the timing of construction, there is potential for standard construction hours to be in periods of darkness. Whilst construction would not routinely require artificial illumination, lighting may be required for certain tasks or during winter months. There is the potential for poorly aimed or controlled lighting to cause environmental pollution to human and ecological receptors.
- 6.5.2 All lighting on site during the construction period will be kept to a minimum (whilst ensuring safety or workers is achieved / security of site). Lighting installed on site during construction will be downward facing to avoid excess spill into the surrounding environment.
- 6.5.3 The site lighting arrangement shall incorporate the following measures to minimise impacts on residential properties birds and other nocturnal wildlife:
 - i) Construction works will typically be undertaken in daylight hours, though due to the latitude of the site, and dependent of the timing of construction, there is potential for standard construction hours to be in periods of darkness. Whilst construction would not routinely require artificial illumination, lighting may be required for certain tasks or during winter months. There is the potential for poorly aimed or controlled lighting to cause environmental pollution to human and ecological receptors.
 - ii) All lighting on site during the construction period will be kept to a minimum (whilst ensuring safety or workers is achieved / security of site). Lighting installed on site during construction will be downward facing to avoid excess spill into the surrounding environment.
 - iii) The site lighting arrangement shall incorporate the following measures to minimise impacts on residential properties birds and other nocturnal wildlife:

- a. Light spill beyond the site boundary to be avoided where reasonably practicable, including through the use of cowls/ hoods where appropriate.
- b. All lighting to be directed away from boundary habitats, mature trees and woodland areas.
- c. Where used, lighting should be task specific (i.e., general site lighting should be avoided where reasonably practicable).

6.6 Energy Usage

6.6.1 Best practice measures shall be followed to reduce energy usage on site (e.g. turning off lights and site equipment when not in use). Car sharing will be encouraged where the potential to do so.

6.7 Sustainability

6.7.1 Sustainability is a core metric which CWE works on with their contractors. All practical measures to reduce road milage, re-use materials, recycle waste, and operate using sustainable practices will be employed during the construction works. In addition, the following measures shall be taken.

Locally Sourced Resources

6.7.2 Wherever possible, sustainably sourced construction materials and practices shall be utilised. This includes sourcing materials and work forces locally (where practical to do so).

Freight Consolidation

6.7.3 Where practical to do so, site delivery vehicles will also serve to remove waste / recyclable products from the site (e.g. utilising empty wagons that have delivered stone to take away excavated soils).

6.8 Pollution Prevention Plan

6.8.1 The measures set out below address the potential pollutant pathways during construction works.

Air Emissions

6.8.2 Polluting emissions from plant on site (SO₂, NO_x) are considered to be in insufficient quantities to have a measurable adverse air quality impact. Plant will be inspected regularly and maintained in line with the manufacturers' instructions. Should any exhaust emissions be deemed smoky, the machine will be removed from service; the machine will only be reintroduced into service following a satisfactory repair.

Spillages

6.8.3 Any chemical / fuel spillages on site shall follow the process steps of; stop contain and notify. Once a spill has been stopped and contained the spillage will be cleared using appropriate spill kits to prevent pollutants entering the local environment. Appropriate bunding around stored chemicals / fuels shall be utilised where necessary.

Lighting

6.8.4 Lighting arrangements will ensure that lighting is directed towards the ground and away from any sensitive receptors or habitats. Where potential pollution risk remains, additional mitigation including light hoods will be incorporated.

6.9 Waste Management Plan

6.9.1 Waste management will follow the hierarchy shown below:



Image 2 - Waste Management Hierarchy

- 6.9.2 All waste produced at the site will be managed in accordance with the company's waste handling procedures. Where appropriate, waste will be segregated in suitable and clearly identified containers / skips. Where possible, a waste collection area shall be established with due consideration given to access / egress of collection vehicles, possible contamination of adjacent watercourses etc.
- 6.9.1 All waste with the potential to leach (e.g. general, waste oil, waste water) shall be held on a nonpermeable base, and at least 10 m away from surface drains. All chemical storage will follow the 10 m rule from field drainage.
- 6.9.2 Transfer notes will be stored on site along with any permits. Records of Waste Carriers Registration Certificate, Waste Disposal Site licenses and limitations on type and quantities of waste shall be available from CWE Head Office on request. A report will be run each month via Head Office to record all site skip empties, if any other waste is removed from site, the site manager / supervisor shall send a copy of all paperwork to the Head office for record purposes.

Waste Movement and Monitoring

6.9.3 Transfer notes will be stored on site along with any permits. Records of Waste Carriers Registration Certificate, Waste Disposal Site licenses and limitations on type and quantities of waste shall be available from CWE Head Office on request. A report will be run each month via Head Office to record all site skip empties, if any other waste is removed from site, the site manager / supervisor shall send a copy of all paperwork to the Head office for record purposes.

Waste Carriers

6.9.4 All waste will be transported using registered waste carriers and will be disposed of at licensed waste disposal sites or in accordance with a valid Environmental Permit (formally Waste Exemption). All Waste Carrier Licences and all Waste Management Licences / Permits are valid and appropriate, shall be available within the site environmental file.

Waste Disposal Sites

6.9.5 Only Waste Disposal Sites and Waste Transfer Stations that hold a valid Waste Management Licence or Permit (formerly Exemption) will be used.

6.10 Security Fencing

6.10.1 The site is located in private land several hundred meters away from public access. Access and egress to the site will be secured via gates or a perimeter fence line. Site security will be managed by the contractor(s) using a heras fencing or equivalent of approximately 2m high. Site security fencing will be installed and will remain in place throughout the construction period. The security fencing would be installed in areas which are hazardous or to protect plant and machinery. The contractor(s) will ensure that the security fences are adequately maintained. Additional detail concerning the storage of plant and materials can be found below.

6.11 Storage of Plant and Materials

- 6.11.1 Plant and Materials utilised during the construction phase of the repowering project will be stored securely on-site. The plant and materials will be stored on an area of hardstanding or gravel, which will be the responsibility of any appointed construction contractor.
- 6.11.2 Bunding will be utilised to manage the use of diesel or chemicals with drips trays utilised when in use. The site will identify areas for waste management, storage of hydrocarbons, raw materials and surface gravel with signage and a dedicated site layout on appointment of the main contractor. The objective of the site layout will to avoid cross contamination of materials and provide a efficiency use of space.
- 6.11.3 Plant and materials will be stored in a part of the Site which is not proximal to any environmental or policy protected sites, within Flood Zone 1 and in a location which is visually screened from sensitive receptors as far as practicable.
- 6.11.4 Cement will be poured into an excavated foundation by cement mixer therefore not requiring any storage on site. There will be no concrete washout at site.

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7.0 **COMPLAINTS PROCEDURE**

7.1.1 It is important that members of the public or interested parties are able to make valid

complaints about construction works and operational activity. Such complaints can

provide a valuable feedback mechanism which could help reduce potential impacts

on sensitive features and also allow the construction and maintenance techniques

to be refined and improved.

7.1.2 Contact details shall be placed at the entrance to the construction site to allow

complainants to contact the site management team. Nearby residential receptors

will be letter dropped with these details. This CEMP will be held by CC Environmental

Health Officers, and will be updated should any contact details required amending.

7.1.1 Any complaints made by members of the public regarding construction activities will

be reported in the first instance to the site management team. Complaints shall be

reviewed and documented appropriately within a logbook and acted upon within 24

hours of receiving a valid complaint.

7.1.2 The site manager shall instruct corrective / mitigation actions if required.

Site Manager: [TBC]

Contact: [TBC]

Operations Manager: CWE

Contact @ operations@constantinewindenergy.com

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Figure 1

Drawing 3369-091-LP-001 Location Plan

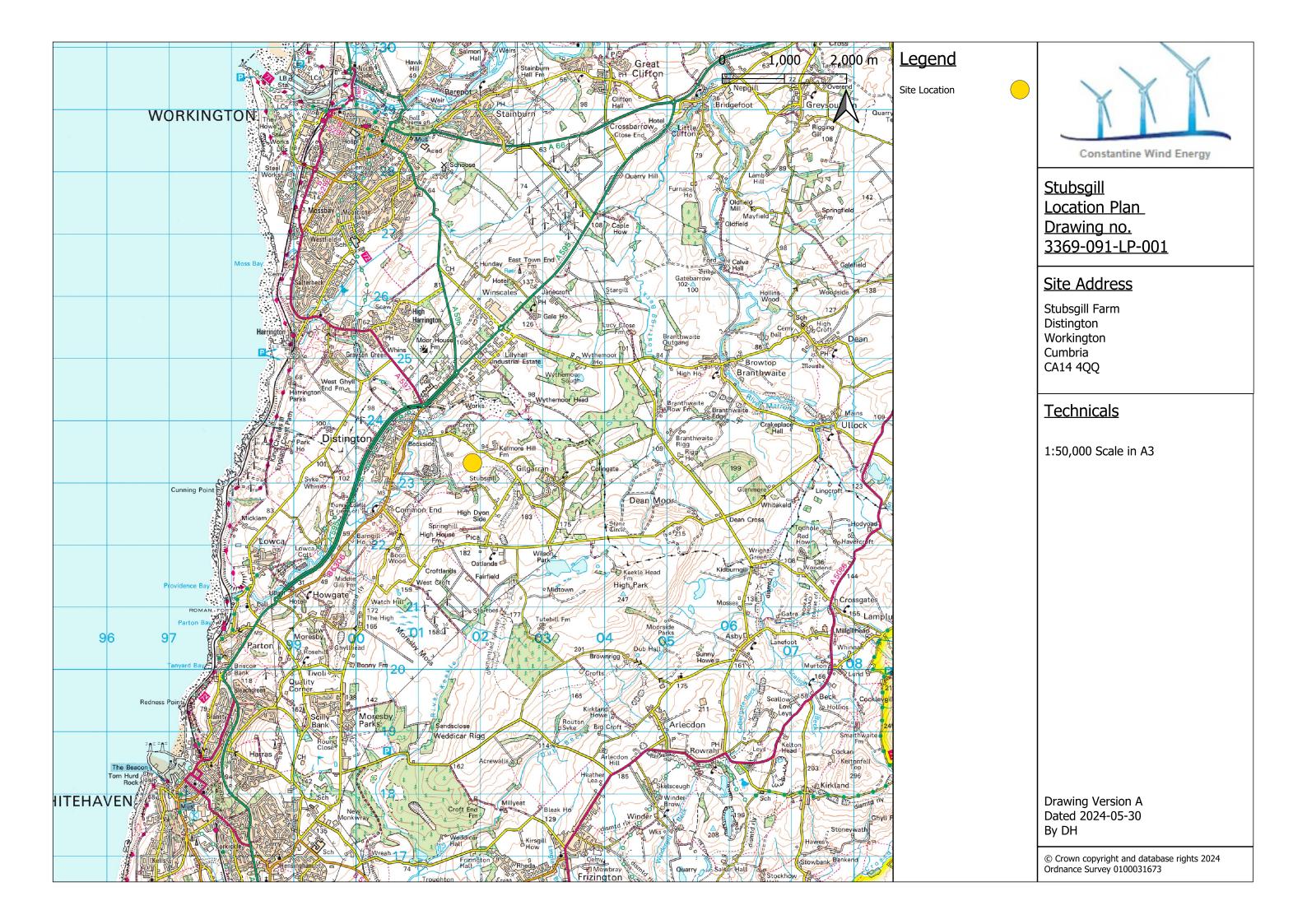


Figure 2

Drawing 3369-091-SP-002 - Site Plan

