

GenR8 North Ltd
The Flax
Works Cleator
Mills Cumbria

**CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN
FOR
THE FLAX WORKS CLEATOR MILLS SITE
CUMBRIA**



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1.0 INTRODUCTION

This Construction Environmental Management Plan has been prepared on behalf of GenR8 North Ltd, who propose to undertake site refurbishment and associated construction works to enable the repurpose of the former mill building, for commercial office space and associated infrastructure, referred to as the Flax Works

The site occupies an area of 0.5ha and is located at the former kangol factory in Cleator Mills, adjacent to a new commercial industrial building to the West of the proposed site with agricultural land surrounding to the North and South with the River Ehen approximately 12 meters to the Southeast of the proposed site boundary.

The management plan includes protective measures which will be implemented by GenR8 North and their appointed contractor. The measures are intended to both avoid significant effects on the SAC and protected species, as well as to protect construction workers, neighbors, and future users.

2.0 LIMITATIONS OF THE REPORT

The recommendations contained in this report represent our professional opinions. These opinions were arrived at in accordance with currently accepted industry practices. The report takes into consideration potential sources, pathways, and receptors and evaluates potential pollutant linkages. Every care has been taken to ensure that the interpretation of the site is based on all known data collected and as such it is not guaranteed that the site is free of unidentified hazardous or potentially hazardous materials. EES prepared this report for our client. Any third party using this report does so entirely at his or her own risk. EES makes no warranty or representation whatsoever, express, or implied, with respect to the use by a third party of any information contained in this report or its suitability for any purpose. EES assumes no responsibility for any costs, claims, damages, or expenses (including any consequential damages) resulting from use of this report or any information contained in this report by a third party.

APPROVED BY	G Litherland	SIGNED	Final	DATE	August 2025
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3.0 ENVIRONMENTAL IMPACTS

- This CEMP document should be read together with other submitted reports and statements submitted in support of the application.

4.1 CONSTRUCTION TASKS

The plan identifies the main activities that are needed to complete the required tasks which include:

- Undertaking construction works, re-fitting the internal parts of the building for use as offices, welfare facilities and associated support infrastructure.
- Stockpiling of suitable recovered stone material prior to recycling or re-use
- Removal from site under current waste management legislation of any waste materials associated with the construction tasks within the building through licensed waste operators.
- landscaping and paving around proposed car parks, and areas of POS.

5.1 RISKASSESSMENTS

- All activities undertaken on site would be subject to a Principal Contractor risk assessment (approved by the Client) by trained staff following approved procedures which would:
 - Identify the significant environmental impacts that can be anticipated.
 - Assess the risks from these impacts.
 - Identify the control measures to be taken and re-calculate the risk.
 - Report where an inappropriate level of residual risk is identified so that action can be taken through design changes, re-scheduling of work or alternative methods of working to reduce the risk to an acceptable level.
- The results of the risk assessments, and their residual risks, are only considered acceptable if:
 - The severity of outcome is reduced to the lowest practical level.
 - The number of risk exposures are minimized; all practical mitigating measures have been taken, and the residual risk rating is reduced to a minimum.
 - The findings of the risk assessment and the necessary controls would be explained to all operatives before the commencement of the relevant tasks using an agreed instruction format.

6.1 METHOD STATEMENTS

Experienced personnel will complete method statements, in consultation with environmental specialists. Their production would include a review of the environmental risks as identified, so that appropriate control measures are developed and included within the construction process. Method statements will contain:

- Location of the activity and access / egress arrangements.
 - Work to be undertaken and methods of construction.
 - Plant and materials to be used.
 - Labor and supervision requirements.
 - Health, safety, and environmental considerations.
 - The risks are associated with potential flooding incidents and implications.
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- Site method statements will be provided by the Principal Contractor or their representative.
 - Prior to commencement of work on site, site fencing to the temporary compound, signage and surrounding the site shall be established.
 - All recovered materials from the associated site clearance works that can be recycled will be subject to a stringent acceptance procedure, Prior to any re-use or placement the material will be stockpiled, and representative samples of the material will be collected and sent for chemical testing at a UKAS and MCERTS accredited laboratory. The material will only be classified as suitable if it is visually, texturally, and chemical and or geotechnically suitable for its intended use, those materials that are deemed unsuitable will be removed from site under current waste management legislation'

7.1 WORK ON SITE

7.2 Drainage

The temporary site compound initially will be located adjacent to the building, all foul water and sewage generated from the site welfare facilities will be removed from site by a licensed contractor removing any potential environmental impact.

Elsewhere, the works are very linear and not necessarily elevated therefore the risk posed by site run off during the initial works is reduced significantly , if upon further inspection risks are increased a 10 meter buffer strip where practicable will be in place with a cut off trench being installed effectively cutting off the potential pathway to the sensitive receptor any ponding or excessive pooling of surface water within the construction site including any relic drainage channels or pipework will be removed, thereafter using pumping equipment any surface waters or run off will be processed through a silt buster unit with any residual discharge being pumped through a Hy Tex dewatering silt control bag overland in the adjacent green field, given the location of the site and the adjacent river Ehen silt curtains will be installed as a precautionary measure.

All tasks undertaken shall view the potential for pollution and by design and good practice minimize any risks to the environment.

Pollution Control Measures

Construction phase operations have been considered and will be conducted in accordance with guidance contained within the Environment Agency Pollution Prevention Guidelines including:

- General Guide to the Prevention of Pollution:
- Above Ground Oil Storage tanks:
- Use and Design of Oil Separators in Surface Water Drainage Systems:
- Works and maintenance in or near water:
- Working at Construction and Demolition Sites:
- Refueling facilities:
- Safe Storage and Disposal of Used Oils:
- Pollution Incident Response Planning:
- Dealing with spills:
- Drums and Intermediate Bulk containers:

Works on site shall follow the best practice guidelines outlined in sections 5 & 6 of CIRIA C532 – control of water pollution from construction sites).

Site personnel will be given training in pollution prevention and control techniques.

Foul drainage

Existing foul drainage if encountered within the footprint of the building will be removed in their entirety preventing any potential historical preferential pathways from being opened, during site construction works, temporary site welfare facilities will be used and maintained appropriately with all waste being removed from site, any new connections made during the renovation works will be undertaken in line with agreed designs and adoption protocols

Monitoring Discharge

During site operations the appointed Contractor will ensure that discharge points are monitored on a daily / shift basis, frequency may be increased depending upon activities along with daily checks of any silt fencing deployed within the river , silt buster unit and or any silt bag units in use in the active areas of construction or demolition works , If pollution is noted within the river , works will be suspended, and the Emergency Incident and Response Plan implemented.

General Monitoring and Maintenance

A site-specific daily monitoring plan will be established to ensure that the works do not impact on the surrounding infrastructure with priority given to the River Ehen, Monitoring will typically be conducted daily. Frequency may be varied subject to the level of activity, location of work and prevailing weather conditions to meet the perceived risk at the given time as described above.

Visual checks will include:

- Change to watercolor.
- Change to water transparency.
- Oily sheen on the surface of the water.
- Scum or foam building up on the surface of the water.
- Signs of dying plants or animals.
- Check the condition of silt fencing.
- Check the condition and operation of the site silt buster.
- Check the condition and operation of the Hy Tex silt bag.

Monitoring surveillance will be undertaken throughout the construction period. The site manager will undertake the monitoring throughout the construction program to ensure environmentally sound working practices are adopted and maintained.

Further safeguards include the potential of site flooding.

A daily inspection of the historical drainage infrastructure where accessible and deemed safe will be conducted and recorded if changes occur. Additional investigations will be undertaken to avoid the potential of environmental damage or incident occurring where necessary they will be removed.

The site lies within a flood risk zone 3 to which site specific risk and method statements will be produced given the proposed works, this will include awareness of current and prevailing weather conditions , alternative secure plant storage areas off site availability of sand bags and barge boards , removal of any chemicals or construction products (in containers) that have the potential to cause harm , evacuation procedures and post flooding remedial works.

7.3 Fuels / Oils

No refueling will be undertaken with the designated construction zone, all refueling of plants will be undertaken off site outside of the flood risk zone, reducing the potential for pollution incidents to occur.

Emergency spill kits, including oil booms and oil absorbent materials, will be retained on the

site and in the site cabin and all site operatives will be trained in their use should any accident or incident occur whilst the plant is being used on site.

Plant should be well maintained with hydraulic leaks repaired. Drip trays shall be used during any servicing or repairs to plant or machinery on site, as necessary.

All precautions regarding the use, storage, disposal, spillage procedures, first aid, etc., will be given within the relevant COSHH Assessment which will be contained within the Site Safety Manual which will be kept by the site manager in the office on site.

During non-operational times including weekends and bank holidays or extended periods of down time, all mobile plant and vehicles will be removed from site to mitigate any risk associated with flash flooding should it occur.

A contingency plan will be prepared to ensure that all staff are trained to recognize and report any pollution incidents on site. These shall be immediately reported to the Site Manager and the Safety Manager, who will in turn inform the relevant authorities.

8.1 PROTECTED SPECIES.

- Prior to any works commencing on site any site-specific risks associated with protected species will be reviewed by a competent person with subsequent assessments and or site-specific requirements being implemented by means of toolbox talks and written into site method statements and risk assessments.

9.0 NOISE & VIBRATION MANAGEMENT

Building activities will be undertaken within the building and limited external elements, most of the proposed works will be undertaken within the footprint of the building given the existing mill being retained and renovated, if deemed necessary noise monitoring will be undertaken and recorded in line with current legislation.

All equipment in use on and around the site will be shut down when not in use, no piling works or ground compaction techniques are to be used on site , specifically vibro- compaction and or rolling of surface materials during the period October to December to reduce the potential adverse impact upon the Atlantic Salmon routes associated with the nearby river

Any operation which is to take place on site, and which is liable to expose employees, or others, to noise levels approaching the first action level, will be assessed in accordance with the Noise at Work Regulations by the Safety Manager. Actions resulting from any such assessment will be implemented and brought to the attention of all concerned by the Safety Manager.

10.0 DUST SUPPRESSION

Given the location of the site and its proximity to the River Ehen Regard will be given to the prevention of causing statutory nuisance problems under Part IIA of the Environmental Protection Act 1990 and dust suppression measures will be employed when conditions require them. Mitigation methods that need to be employed during the construction phase are outlined below.

Awareness and significance of dust pollution shall be included in the site induction procedures for all personnel, contractors, and sub-contractors.

All vehicles transporting materials shall be sheeted to and from the site. By limiting the speed of general vehicles within the site to 5mph the potential for dust generation will be reduced.

The prime source of dust on site will arise from the movement of vehicles on the site access roads, this will occur primarily during periods of dry and windy weather. In such circumstances dust shall be controlled by wetting the surface of the site and / or soil and other material especially during loading or unloading and restricting vehicular access only to wet areas. The frequency of use shall be managed by the on-site manager or his representative on site.

Under extreme circumstances plant and vehicular movements will cease until dust control methods are implemented and successful.

Appropriate dust suppression should also be employed at the request of the Local Council or Environmental Health Services.

11.0 SITE WASTE MANAGEMENT / REMEDIAL WORKS

All materials generated throughout the construction phase will be subject to site specific management given the age and historical use of the site, prior to any re-use on site or offsite disposal stringent testing will be undertaken in line with current legislation.

The site manager will be responsible for the implementation and monitoring of waste generated throughout the construction phase and implement both safe segregation of site won materials and the segregation of those materials which have been identified as potential sources of contamination, all materials will be assessed for potential re use on site prior to being used with those materials deemed unsuitable being removed from site as soon as possible.

All waste will be clearly identified and placed in the relevant skips, any materials deemed hazardous will be stored securely, covered, and removed from site as soon as practicable to prevent any potential environmental impact.

Copies of all chemical testing, duty of care and any hazardous waste consignment notes will be retained on site in the site office and be available upon request.

12.0 VERMIN CONTROL MEASURES BIO SECURITY MEASURES

The Principal Contractor will implement adequate arrangements for the removal of waste generated from site welfare facilities and maintain those in accordance with best practice.

The site manager is responsible for site tidiness; he will ensure that adequate resources and time are given to keeping the workplace clean and tidy. Employees and subcontractors will be made aware of the need for good housekeeping as part of their induction safety training.

People will be delegated to carry out clearing up operations throughout the course of the working day.

All waste will be placed in designated areas that will house suitable containers that will be removed from site on a regular basis.

Any waste hazardous substance/s will be clearly identified, bagged, and disposed of to a licensed tip. Individuals will be delegated by the site manager to implement the above.

Bio-security measures will be implemented across the site to prevent the introduction and the spread of diseases or invasive species.

A specific survey will be conducted prior to the works for invasive species. If any Japanese knotweed Himalayan Balsam or other invasive species are identified, the area will be immediately demarcated out of the construction area using a 7m buffer around the impacted zone which will be securely fenced off and labelled with signage with further advice being sought. Other species would have their own control / eradication requirements and advice from a specialist should be sought and implemented as soon as possible to avoid any further spread.

No personnel or machinery will be allowed into the affected area, without

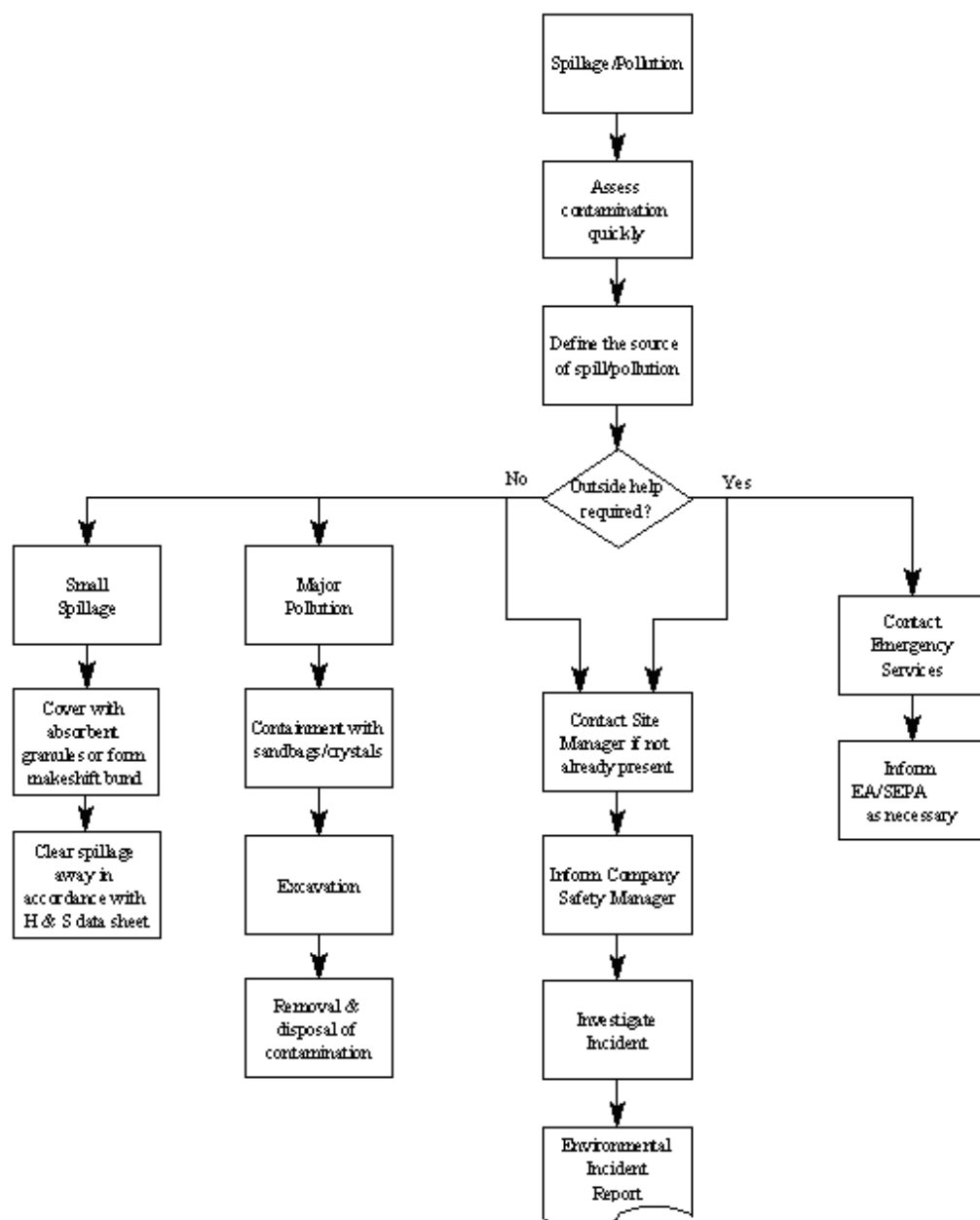
authorization from the Client and Principal Contractor, and then subject to full control. of associated risk and method statements being in place.

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Site Cabins

Waste bins will be positioned inside the site cabin; these will be emptied daily or as and when required, site cabins will also be swept daily, by a delegated person. If an infestation occurs the contractor will take such actions as is necessary to deal with them, as required by the relevant local authority.

13.1 EMERGENCY RESPONSE



General

The flow chart details the actions to be taken if a hazardous substance is spilled or there is major pollution.

Containment

- Call out / alert all other people on-site to the emergency.
- Clear up all spillages as quickly as possible.
- If there is a risk of spillage entering drains or watercourses, the EA Pollution Prevention Officer, Local Authority Contaminated Land Officer, Fire Authority and Police as appropriate should be informed.

- Put on personal protective equipment.
- Isolate liquid spillages within a ring of inert absorbent. Make any leaking or ruptured containers safe.
- Shovel contaminated absorbent into an impermeable container (e.g., a heavy-duty plastic bag).
- Place all contaminated materials (e.g., used paper, brush heads, contaminated disposable coverall) into an impermeable container:
- Tie off and label the container (indicate name of product involved). Put the container in a secure place to await disposal.

Personnel Contamination

- Remove personnel from the source of contamination immediately and inform the site manager.
- Carefully remove all protective clothing and any other clothing that may have encountered it.
- Wash contaminated skin, eyes, and hair thoroughly in plenty of water.
- Seek medical advice and help as soon as possible, taking the relevant product label(s). If this is not possible, note the product name; take any appropriate product safety data sheets if visiting a doctor or hospital.
- Put all contaminated clothing in a heavy-duty plastic bag for decontamination (washing) or safe disposal later.

14.0 Wheel Washing

Wheel washing facilities at present are not deemed necessary given the distance from the site to highway, should the weather deteriorate, or if the site haul roads become comprised facilities will be implemented on site including a road sweeper.

15.0 Car Parking

An area for car parking will be allocated for use by the on-site contractors and visitors will be created adjacent to the site cabin.

16.0 Road Cleaning

Mud on the highway is a source of nuisance and potentially reduces road safety. To minimize any debris mud on the highway the site will implement the following measures.

The need for the prevention of any spillage / mud on the highway shall be included in the site induction procedures for all personnel and third-party haulage companies.

All lorries leaving or arriving on site will have been securely sheeted to prevent spillage from the donor site.

Hard standing areas will be provided for vehicles entering, parking, and leaving the site.

Wheel washing facilities will be provided at the site if deemed necessary.

If, despite the controls in place, mud does leave the site and impacts upon the highway, remedial action will be taken by site personnel either using a road sweeper or manual labor.

17.0 WORKING HOURS

Working hours will be restricted to between 07:30hrs and 18:00hrs between Monday and Friday and between 07:30 and 13:00 on Saturdays with no work to be conducted on Sundays or Bank Holidays. Winter daylight hours may restrict working hours further and only emergency or essential maintenance operations will take place outside these hours or on Sundays.

Lorry deliveries will be checked (i.e., companies notified prior to deliveries) to prevent arrivals outside normal working hours.

18.0 HY TEX SILT BAG DETAILS



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19.0 SILT CURTAIN DETAILS



Pro-Tex™-Silt-Curtai
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20.0 SILT BUSTER DETAILS



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