


# Construction Environmental Management Plan (CEMP)

<b>Project Reference:</b>	<b>Project Daffodil</b>
<b>Project Location:</b>	Cumbria – North West England – District of Cumberland, Westmoreland & Furness
<b>Client:</b>	<b>Fibrus Ltd</b> - Floor 8, West Tower, Lanyon Plaza, Lanyon Place, Belfast, BT1 3LP
<b>Local Authorities:</b>	Cumberland Council and Westmorland and Furness Council
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1	0	Initial Draft	Mike Heathcote
1	1	Sec 1- (Para 2) Updated – Sec 3 (Para 2) updated - Sec 9.2 (Para 1)-Sec 9.3.1 (Para 1)-Sec 7 (Objectives updated)- Sec 12 (New sub section included for TPO)	Mike Heathcote

*The CEMP must receive approval from the Projects and/or Operations Director of Novo Technologies before being submitted to both the principal designer and the Client. Any modifications to this plan will require agreement and approval from Novo Technologies. The CEMP will function as a dynamic document, subject to regular reviews to incorporate new environmental information that may arise during the construction phase. It will also facilitate the integration of any additional conditions and amendments resulting from permit approvals or valid concerns raised by Third Parties.*

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## Approval for Distributions

Version 1.1 of the CEMP has been approved for distribution by the HSEQ Director – John Evans – Fibrus Ltd on the 12<sup>th</sup> November 2024.

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## 1. Introduction

Novo Technologies Ltd has been engaged by Fibrus Ltd to develop a Construction Environmental Management Plan (CEMP) to support environmental permit applications for Project Daffodil, specifically concerning the temporary underground and overhead fibre telecommunications construction activities (Fibre Broadband rollout) in the District of Cumberland, Westmoreland & Furness.

In partnership with local authorities, infrastructure owners, landowners, the environmental agency, Novo Technologies and community members, Entegro the principal designer will identify site specific Environmental risks using Arc Gis layered mapping to file environmental permit applications with the environmental agency. This initiative seeks to obtain permits for temporary constructions near Neolithic monuments, ecological and archaeological sites, heritage locations, areas designated for habitat and species protection, as well as sites of special scientific interest (SSSI).

The purpose of the Construction Environmental Management Plan (CEMP) is to outline the responsibilities related to legal compliance and to execute necessary mitigation strategies. This CEMP specifies management practices designed to reduce environmental effects during the temporary construction phases of the Fibre broadband rollout.

This CEMP establishes a framework for the implementation of measures throughout the project. This framework also outlines management strategies tailored to the project and is a living document that should be reassessed if any activities or conditions in the operational build areas could or may impact environmental management practices.


This document has been created to prevent, reduce, and address any environmental impacts associated with construction activities and their effects on nearby communities. It is intended to be a dynamic document, subject to regular reviews by all relevant stakeholders and interested parties at predetermined intervals, with updates incorporated as necessary.

## 2. Scope

The working area(s), as defined in this document, encompasses any location where temporary works are necessary to support the construction of the underground / Overhead fibre broadband rollout. This definition includes spaces needed for access, temporary warehouses, vehicle and equipment laydown areas, as well as other storage facilities leased and utilised by the Principal Contractor.

## 3. Regulations

This Construction Environmental Management Plan (CEMP) is essential for the application of local authority and environmental planning policies and regulations such as – but not limited to the Conservation of Habitats and Species Regulations 2010, and the Countryside & Rights of Way Act (2000), [Part VIII of the Town and Country Planning Act 1990](#) as amended and in the [Town and Country Planning \(Tree Preservation\) \(England\) Regulations 2012](#) that include necessary environmental controls and adhering to the forementioned applicable environmental legislation.

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Given the project's rapid progression, this document has been created in preparation for the potential requirement of permits throughout the project's lifecycle. The CEMP aims to guarantee that specific criteria are established and maintained during the construction phase of the project.

## 4. Standards

British Standards (BS) outline guidelines for managing noise and vibration on construction and open sites, specifically BS 5228-1: 2009 + A1: 2014 and BS 5228-2: 2009. The strategies and protocols detailed in these standards are regarded as the most effective methods for noise mitigation in construction environments. Novo Shall incorporate these codes of practice when developing site-specific control measures for the Construction Environmental Management Plan (CEMP).

## 5. Permitting

Permitting determines if an operation can be managed on an ongoing basis to prevent or minimise pollution.

When the Environment Agency receives our application, they will check if it could harm protected sites, species or other wildlife. The distances they use for this screening vary between different activities and different receptors.


The Environment Agency will check if our proposed activity could affect:

- national parks
- areas of outstanding natural beauty
- sites of special scientific interest
- special areas of conservation
- special protection areas
- Ramsar sites (wetlands)
- marine conservation zones
- ancient woodland &
- local sites

We can use Magic map to find all these sites apart from local sites. Information about local sites can be found from the local ecological records centre.

When the Environment Agency determines our application, they may carry out assessments to decide whether our activity could affect protected sites. They may need to notify or consult Natural England (or Natural Resources Wales) about these assessments. Natural England usually take **28 calendar days to respond**. This may impact on the time it takes for the Environment Agency to determine your application.

The Environment Agency may need to ask you for more information to help them do these assessments. For example, extra survey information or more details on your application.

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## 6. Our Policy and commitment

Novo Technologies, as the designated principal contractor, is committed to executing the project in a way that reflects its dedication to environmental management. The company is currently certified under ISO 14001:2015 by UKAS for its Environmental Management System. To uphold this certification, Novo Technologies and its approved subcontractors will consistently comply with environmental standards and strive for ongoing improvements to minimise environmental impacts.

## 7. Objectives

It is essential to establish environmental management, control measures, and safety protocols that must be implemented during the development of our temporary sites. This will serve as a mechanism for the ongoing assessment of potential environmental impacts arising from our construction activities. We are committed to ensuring that all civil works, reinstatement efforts, and cabling construction activities minimise disruption to local communities and the General public.

Our objectives for the project sites are to

- Minimise the impact of construction traffic
- Maintain strong community relations
- limit and control emissions to air during construction to avoid direct and indirect impacts on community and ecological receptors.
- limit and control noise and vibration during construction
- Establish all essential measures to prevent land and water pollution, thereby safeguarding European species, including freshwater pearl mussels and great crested newts.

## 8. Environmental asset data and as built drawings

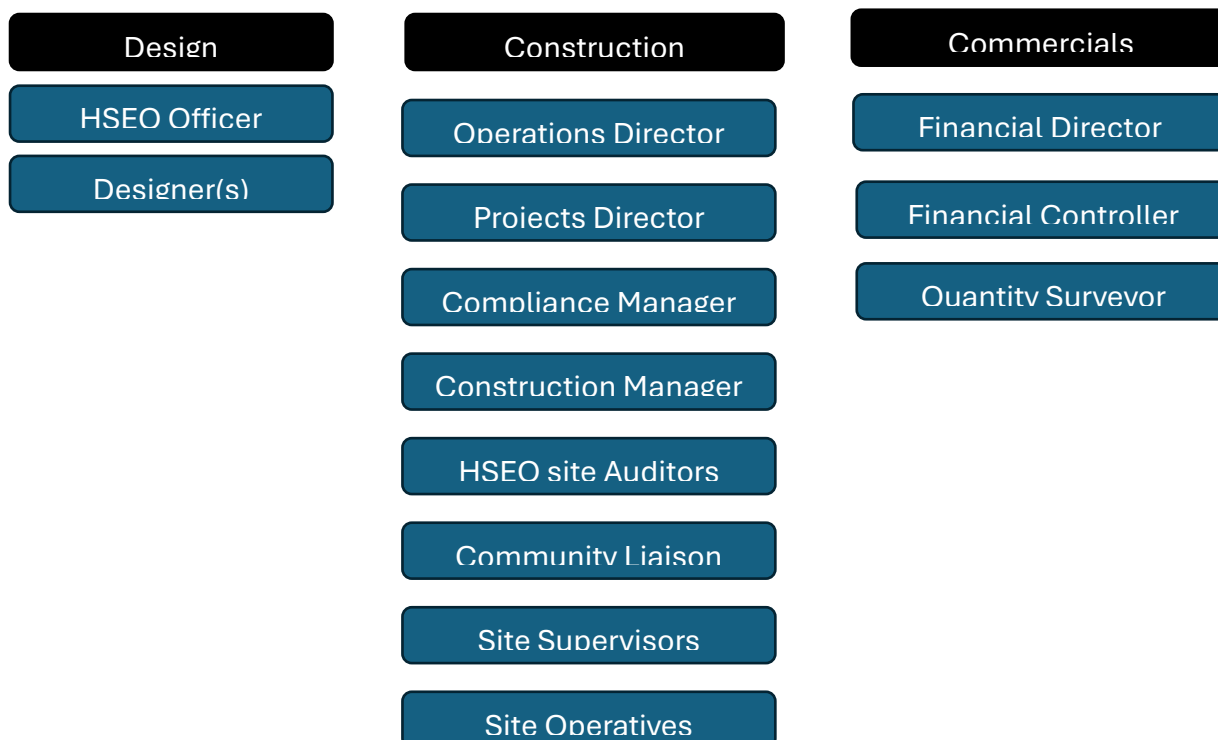
Fibrus employs two cloud-based systems for the project: ArcGIS and the HSQE Hub. ArcGIS serves as a multi-layer mapping platform that captures environmental and other site risks, incorporating specific environmental data provided by various service providers. Both the Principal Designer and Principal Contractor have acquired their own licenses, allowing Fibrus to share project mapping and construction planning, while also identifying areas of environmental sensitivity.

This data is instrumental in managing the environmental aspects within and around the project boundaries, as well as in reviewing and reporting on environmental performance through the HSQE Hub.

The primary objective of ArcGIS and the HSQE Hub is to support all stakeholders in designing and managing construction sites in an environmentally responsible manner. Specifically, it aims to achieve key strategic and operational goals, including the consistent and accurate recording of environmental data, enhancing the review and reporting of environmental performance, and improving the understanding of environmental issues throughout various stages of site management. Additionally, it facilitates the prioritisation of environmental

management actions based on the condition of elements and objectives, aids in the transfer of environmental data from designers to the principal contractor and supports the development of tailored environmental management programs and strategies.

## 9. Environmental Key Organisation & Responsibilities



### 9.1. Fibrus

Fibrus shall ensure that the appropriate persons are appointed to review environmental and related aspects such as ecological, archaeological, heritage etc. that may impact on the works and procure the appropriate survey information.

### 9.2. Local planning authorities

Local planning authorities are responsible for determining and approving permitting applications.

### 9.3. Entegro Ltd – Principal Designer

The principal designer Identifies, applies and shares all Environmental sustainability group (ESG) related information with the Principal Contractor and is responsible for delivering comprehensive design drawings that include environmental data reflecting the project's final specifications. Designers will gather and input information into ArcGIS, outlining all components related to the project's planning and design, Environmental risks and areas deemed environmental sensitive, as well as the environmental management strategies that will be implemented during construction with the overall design risk management register. This process also considers the existing elements that may be impacted.

During the construction phase, As Built Drawings and environmental data are compiled to document the project's completion before handover. Principal Designers gather and provide ArcGIS data that outlines all elements related to the construction process, along with planning for necessary environmental management actions to be executed by the Principal Contractor as part of the building process. Also, shall:

- Highlight on **Arc GIS** any Known or potential exposure to Environmental risks
- Laise with the local authorities and or the Environmental agency for the application of permits
- Identify and consider with Novo Technologies the Environmental risks for the sites, and the sources of the risks.
- Identify the receptors (people, animals, property and anything else that could be affected by the hazard) at risk from your site.
- Identify the possible pathways from the sources of the risks to the receptors.
- Assess risks relevant to your specific activity and check they are acceptable and can be screened out.
- State through the design risk assessments what will be done to control risks if they are too high, and
- Submit the environmental risk assessment as part of the permitting application.

## 9.4. Novo Technologies Ltd

### 9.4.1. Appointed Principal Contractor

Novo Technologies Works to comply with the ESG conditions shared by the Principal Designer, including provision of any site attendance required to meet those conditions, will maintain and control the comprehensive CEMP once the design as the construction plans is being developed and or completed. The responsibility for achieving environmental and project goals, as well as complying with applicable environmental regulations and policies, will be shared among the client, principal designer, Novo Technologies project personnel, and approved subcontractors.

It is crucial for all site personnel to be aware of their environmental duties and their effects on local communities, receiving adequate training through E-Learning during project inductions, toolbox talks, site induction modules, and specific method statements as necessary. Novo Technologies will designate key personnel to manage site environmental practices, ensuring the effective execution, reporting, and monitoring of environmental initiatives throughout the contract. Subject Environmental advisors will be engaged for specific guidance in collaboration with the principal contractor. Detailed roles and responsibilities for environmental management will be specified in subsequent sections, with individual names and contact details provided by Novo Technologies prior to the commencement of construction.

#### 9.4.2. Compliance manager – (Environmental manager)

The compliance manager will oversee the environmental aspects & Impacts of the project on behalf of Novo Technologies This includes:

- coordinating with experts and engaging with the PD to establish working hours, discuss methodologies.
- Will audit the Principal Contractors' Site Environmental Management Plans and Programs to ensure adherence to regulations. Additionally,
- will monitor compliance with the environmental stipulations outlined in the Works Information and will continuously review and stay informed about legislation, policies, and strategies throughout the construction phase.

#### 9.4.3. Projects & Operations Director

The Project & Operations Directors holds the primary responsibility delegating and overseeing the preparation and execution of the Construction Environmental Management Plan (CEMP), along with associated Procedures and Method Statements, ensuring adherence to all legal and contractual obligations.

- This role includes managing environmental risks effectively and allocating sufficient resources (human and financial) to oversee the environmental aspects of the contract while safeguarding the environment.
- Will also determine necessary actions based on environmental audits, incidents, and complaints from the local authorities and the client, while fostering relationships with external environmental organisations and the public. Upholding Novo Technologies' Environmental Policy and Objectives is crucial, with a focus on identifying risks and implementing suitable mitigation strategies.
- Tasked with promoting environmental awareness among personnel, ensuring that staff are informed of their responsibilities under the CEMP and related procedures. This includes the completion and submission of applications for statutory consents and briefing personnel on compliance obligations.
- Responsibilities also extend to liaising with both statutory and non-statutory authorities and the public, providing environmental induction training, and conducting regular 'Toolbox Talks' for all personnel, including subcontractors.
- Additionally, the role encompasses the implementation of an emergency response plan, thorough reporting and investigation of environmental incidents, and maintaining communication with the Construction Manager and project supervisors.
- Finally, must establish proper protocols for the storage, disposal, recycling, and reuse of waste, as well as for the storage of fuels, oils, lubricants, aggregates, and spoil.

#### 9.4.4. Community Liaison Operative

The Community Liaison operative will serve as the primary point of contact for all stakeholders and interested parties. Shall:

- Develop, implement, and sustain the Community Relations Strategy.
- Engage with farmers and landowners prior to and throughout the construction phase. Inform local residents, nearby property occupants, and businesses at least two weeks in advance with the use of “Letter drops” about the nature and expected duration of construction activities that may impact them. Set up a dedicated freephone helpline, along with a specific email address and postal address for inquiries and complaints during the construction period.
- Ensure that relevant contact information is prominently displayed on signage at each construction site and is available on our website.
- Maintain logs for comments, inquiries, and complaints, and ensure that feedback is shared for appropriate responses and action implementation.

#### 9.4.5. Construction manager

The Construction manager must make sure and execute the project in alignment with the Project Drawings, Contract specifications, and the environmental standards outlined in the CEMP. This includes

- The coordination of labour, plant, transportation, and equipment to meet environmental criteria.
- Ensure that all subcontractors are informed about Novo Technologies' Environmental Policy and the stipulations of the CEMP, along with relevant Procedures and Method Statements. The implementation of the CEMP Environmental Procedures and Method Statements is crucial, as is the execution of any actions derived from audits or inspections. Additionally, it is necessary to ensure conduct bi-weekly environmental inspections and ensure that all identified actions are resolved within the framework of the SLA agreement.

#### 9.4.6. Health Safety & Environmental Advisors

Ensures the implementation of Novo Technologies' Environmental Policy and that is aligned to the Integrated Management System (IMS) requirements, and that:

- All project personnel, including subcontractors and directly employed staff, must undergo project induction and successfully complete the assessment for Environmental Awareness and Green Sustainability.
- Coordinate environmental monitoring and ensure site audits are completed. Progress is monitored against established Question sets, objectives and targets, while the Construction Environmental Management Plan (CEMP) is produced, revised, and tracked.

- Undertake Internal audits to verify compliance with the IMS, and incidents reported from the sites are reviewed.
- Ensure Compliance with relevant environmental legislation and other requirements is tested, and monthly reports are provided to the client.

#### 9.4.7. Supervisors

- Conducting site inductions focused on environmental practices, facilitating toolbox talks, performing specialised surveys, and supervising necessary monitoring activities.
- Carrying out daily monitoring and compliance assessments.
- Ensuring adherence to environmental regulations on site.
- Updating and maintaining site-specific method statements.
- Assessing dust, noise, and vibration levels, with details to be determined in collaboration with the local authorities and incorporated into the formal Section 61 agreement if necessary.
- Tracking working hours to comply with established noise and vibration thresholds in consultation with the appropriate Local authorities.
- Collaborating with the Health & Safety advisors to develop an Emergency Spill Response Plan for on-site incidents.

Site specific information must be conveyed to all operatives such as job requirements, welfare facilities, emergency, procedures, parking, traffic, PPE.

If there are serious concerns that an individual is not capable of understanding or completing an induction due to language or reading/writing difficulties, then the inductee's manager should be notified, and the individual must not be allowed to start work until an induction is completed and understood. Consideration must be made as to the understanding of CEMP RAMS and Site Signage also. In all circumstances Site supervisors have full responsibility as to who is allowed onto the site and when.

On the completion of an induction the induction form should be handed out for completion. This will allow for any key points that were not understood to be reiterated. Where an inductee has notified and or indicated that they are taking prescribed or off the shelf medication that may or may not impact their ability to work due to side effects then the supervisor is to contact HR and or the inductees employing manager to seek guidance – the individual is to be removed from site and escorted to the welfare vehicle pending further instructions.

#### 9.4.8. Environmental Consultants

Novo Technologies retains the right to engage environmental consultants and will ensure that all consultants are thoroughly vetted and onboarded before their assignments commence.

#### 9.4.9. Operatives are responsible for.

Adhering to the stipulations of the Environmental Management System, this CEMP, along with method statements and risk assessments, is essential. It is crucial to comprehend emergency response protocols and to complete all necessary environmental awareness and technical training.

## 10. Environmental Training and Awareness

All staff and subcontractors will undergo environmental induction training, which will cover general issues as a foundation. Specific site-related topics, such as method statements and environmental risk assessments, will be discussed during team briefings and toolbox talks. No individual, including subcontractors, will be allowed to start work on site without first completing the induction training course. To enhance the induction training, regular toolbox talks (TBTs) on specialised subjects will be conducted. Documentation of all TBTs and participant attendance will be maintained.

The training program aims to foster a sense of individual environmental responsibility and highlight the significance of environmental protection. Additionally, the program will be structured to allow for feedback regarding the practicality of environmental procedures.

## 11. Construction Program & Methodology

The construction project is expected to last around 15 months, as indicated in the high-level schedule provided in figure 1 below:

A Health, Safety, and Environmental Plan for the construction phase of this project will be developed, encompassing several key components: an organisational chart outlining roles and responsibilities, monitoring protocols for health, safety, and environmental concerns.

Generic risk assessments, method statements, site-specific plans, procedures for accident and incident investigation, utility investigations, and emergency arrangements.

This document will serve to emphasise the necessary safety checks and procedures required throughout the construction process. All personnel will acknowledge their understanding of this plan through a signature during the induction process.

OLT	Sequence	Start date	Build Complete	Total Duration	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26
Askam in Furness	1	25-Nov-24	23-Jun-25	210	X							X							
Wigton	2	20-Jan-25	18-Aug-25	210			X							X					
Alston	3	27-Jan-25	24-Sep-25	240			X								X				
Dalton-in-Furness	4	10-Feb-25	10-Jul-25	150				X					X						
Sedbergh	5	24-Feb-25	23-Aug-25	180				X						X					

Shap	6	17-Mar-25	12-Nov-25	240						X								X		
Grange-over-Sands	7	14-Apr-25	11-Oct-25	180							X							X		
Holme	8	21-Apr-25	18-Sep-25	150							X						X			
Millom	9	19-May-25	15-Nov-25	180								X							X	
Seascale	10	02-Jun-25	28-Jan-26	240									X							X
Kirkby Stephen	11	23-Jun-25	20-Dec-25	180									X						X	

## 12. Site Operations, Locations and Operating Hours

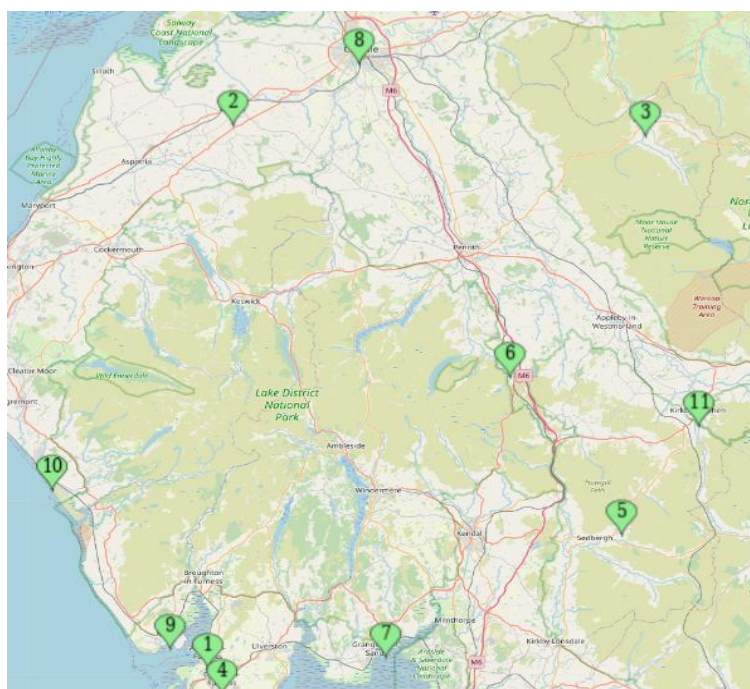
### 12.1. Project Description

The project consists of a Fibre to The Home (FTTH) Telecoms network installation within Eleven towns across Cumbria denoted on the map (Figure 1) known as project Daffodil.

- (1) Askam-in-Furness
- (2) Wigton,
- (3) Alston,
- (4) Dalton-in-Furness
- (5) Sedbergh
- (6) Shap
- (7) Grange-over-Sands
- (8) Holme
- (9) Millom
- (10) Seascale and
- (11) Kirkby Stephen

The works will be split between underground and overhead installation and will involve installation and excavation in the public highways, footways, and private land. Installation of fibre optic cables in new and existing highways, duct work, fibre optic cable installation in public and private buildings and street cabinet installation. The project also plans to be fed via overhead pole access, mostly on existing BT Openreach infrastructure, and in a few cases may require new poles to be erected.

Figure 1 – Temporary project work sites



## 12.2. Site(s) Operating hours

The suggested operating hours are detailed below. During the construction phase, there may be rare instances where work outside the established hours is required. In such cases, the timing and length of these activities will be discussed with the Local Authorities.

- Monday to Friday 08.00 to 18.00
- Nights – as required & approved
- Weekends - as required & approved
- Sundays and Public Holidays – as required & approved

All works must be carried out in compliance with the The Working Time Regulations 1998.

## 12.3. Artificial lighting

Novo Technologies and its subcontractors may need to utilise artificial lighting, specifically mobile tower flood lights, during seasonal transitions, particularly in the autumn and winter months. These lights will be sourced from a reliable supplier. Novo Shall ensure that:

Flood lighting, security lights, and any other obtrusive external lighting shall be sensitively located so as to avoid nuisance to neighbouring properties and should only provide the necessary luminance for the relevant task(s).

- Lighting schemes shall be compliant with the Institution of Lighting Professionals Guidance Note 01/21 “The Reduction of Obtrusive Light”.

## 12.4. Construction site(s) Security & Housekeeping

The safe passage of road users and pedestrians shall be maintained by complying with the Code of Practice for “Safety at Street Works and Road Works” published 2013 and Chapter 8 of the Traffic Signs manual published by the Department of Transport as well as part 4 of the CDM L153. Site supervisors shall monitor all sites to ensure the appropriate signing, lighting, and guarding is maintained at all times.

This is to ensure the safety of the public and personnel. Keep obstructions to public and private thoroughfares to a minimum, consistent with the execution of the Works. Novo shall take all necessary precautions at all times to ensure the safety of the Public and Personnel, throughout the execution of the Works. Novo shall ensure all open trenches and chambers are protected by appropriate signing, lighting, and guarding at all times, and shall ensure that every chamber is correctly closed.

Any damage or faults to chamber covers (and frames) must be notified immediately to the client and the appointed build manager.

Operatives shall ensure that all rubbish is removed from the site regularly and transported to our central waste collection point (the warehouse or temporary lay down yard for onward collection by a certified waste collection contractor).

## 12.5. Dust

A dust impact assessment will be recognised during the planning application phase and is influenced by several factors. These include the extent and type of the proposed works, the area's sensitivity, the anticipated duration of the activities, any previous dust-related complaints in the region, and the combined effects of other ongoing developments nearby. Novo Technologies shall ensure:

- All plant and equipment shall be maintained in accordance with manufacturer's recommendations to ensure emissions to atmosphere are minimised.
- Any equipment used to cut paving blocks, kerbs, flagstones etc. shall be operated with a water suppression attachment or a dust filter.
- Engines of plant, machinery, and lorries shall be turned off at all times when not in use.
- Delivery activities, plant, stockpiled materials and/or any other activities liable to significant dust generation shall be located as far away as possible from the development site boundaries and neighbouring properties.
- Stored materials liable to dust generation shall be dampened down, covered with tarpaulin, or otherwise contained as far as reasonably possible.
- Skips shall be covered and if necessary enclosed to ensure that dust does not escape.
- All vehicles carrying dusty materials shall be securely covered. Water suppression shall be used in dry conditions to reduce dust emissions.

## 12.6. Construction Noise and Vibration

Novo Technologies recognises that the project sites are situated in both residential and Rural areas. Therefore, subcontractors will be informed about the sensitive receptors in the vicinity and the necessity of utilising appropriate tools during their tasks.

Potential sources of noise associated with this project may arise from activities such as excavations, cabling operations (both overhead and underground), transportation, cleaning (jet washing), construction, and waste removal and management (using grab wagons), along with any temporary disruptions these activities may cause. Novo Technologies shall ensure:

- All vehicles and plant used during the works will be maintained in good and efficient working order, and in accordance with manufacturer's specification.
- All vehicles, mechanical plant, and machinery used during the development shall be fitted with proper and effective silencers (where available AND/OR in compliance with health & safety requirements) and shall be maintained in good and efficient working order.
- All plant and machinery in intermittent use shall be shut down in the intervening periods between works.
- Plant and machinery capable of generating significant noise and vibration levels will be operated in a manner to restrict its duration.
- Static plant and machinery shall be sited as far away as possible from inhabited buildings or other noise sensitive locations.
- All compressors shall be 'noise reduced' models that are fitted with properly lined and sealed acoustic covers which shall be kept closed whenever the machines are in use. All ancillary pneumatic percussion tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Wherever possible mains electricity or battery powered equipment shall be used instead of diesel- or petrol-powered generators.
- The handling of materials shall be conducted in such a manner that minimises noise, including minimising drop heights into hoppers and lorries.
- No stereos or similar amplified devices shall be audible beyond the site boundary


## 12.7. Construction waste

Novo Technologies is committed to taking all necessary measures to ensure that:

All site waste is managed in compliance with the waste duty of care outlined in [Section 34 of the Environmental Protection Act 1990](#) and the Environmental Protection (Duty of Care) Regulations 1991; and that materials are processed effectively while waste is handled responsibly.

The waste hierarchy to be adopted across all sites is structured as follows:

1. Prevention/Reduction: Effective planning can minimise waste generation.
2. Re-use: Items and materials may be repurposed for the same or alternative uses.

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3. Recycling and Composting: Valuable resources can frequently be extracted from waste.
4. Disposal: Waste should only be disposed of when none of the preceding options are viable solutions.

### **12.7.1. Waste Segregation**

Waste should be separated by type at the point of generation to facilitate proper disposal. The Gangs on site will assess the logistics and implement measures to prevent pollution and cross-contamination of waste on the premises.

### **12.8. Members of the public**

Safety and loss prevention shall be an integral part of each project site. The management team expect all employees, contractors and site workers to provide their full participation, cooperation and support that is necessary and required to ensure the safety and health of all persons, including members of the public and property involved in the project.

All workers on this project shall. Conduct their work in a safe manner, to immediately correct any unsafe act and/or condition pertaining to their work, to take prompt corrective action and to ensure that work activities proceed in a safe manner.

To implement measures to create a universal awareness, which promotes safe practices at the work site, and strives towards the achievement of Zero Incidents. Take into account and provide additional site security and consideration of particularly vulnerable groups such as children, the elderly or those with disabilities. Especially if the site is in a general proximity of premises frequently used by vulnerable groups, such as hospitals, clinics and schools.

### **12.9. Private land users**

The fibre network has been developed with the assumption that construction will occur along public highways. However, if any land is identified as private when applying for permits from the Local Authority, it is essential for the Novo build and projects team notify the Principal Designer.

The Principal Designer will then coordinate with the Fibrus Wayleave team to obtain any necessary wayleaves. Continuous assessment by the Novo team, along with consultations with the Principal Designer, is crucial to identify the following factors during the construction process: Water courses, Contaminated land areas, Flood-prone regions, Unstable or unsettled land, Areas with dense vegetation or tree roots, Sites of Special Scientific Interest, Archaeological or Historic sites, Busy Road intersections or nearby railways.

The overall condition of existing structures, such as lighting stanchions Sensitive land uses nearby, including schools and residential homes Hazardous land uses in proximity, such as petrol stations and substations.

## 12.10. Tree Preservation Orders

A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity. An Order prohibits the:

- cutting down
- topping
- lopping
- uprooting
- wilful damage
- wilful destruction

of trees without the local planning authority's written consent. If consent is given, it can be subject to conditions which have to be followed. In the Secretary of State's view, cutting roots is also a prohibited activity and requires the authority's consent.

On all occasions, regardless of where excavation works are taking place, the National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees document must be adhered to. The NJUG guidance must be available on site for all site teams that are excavating and must be adhered to at all times when working near trees.

Materials, plant and equipment must not be placed on or against trees or where tree roots may be present.

Project Inductions will include references to Novo Guidance note GN\_153\_Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees

## 12.11. Traffic Management & Plant Management

Novo Technologies will develop a Traffic Management Plan as part of site setups. To comply with the permit restrictions outlined in the plan, a trained traffic marshal will be present on-site to oversee and manage deliveries. The following vehicles and equipment are anticipated to be utilised on-site: commercial vehicles, excavators, peckers, wackers, rammers, petrol breakers, generators, dumpers, and compressors.

The following measures for traffic and plant management will be enforced:

- Delivery vehicles will, whenever feasible, schedule operations outside of peak public traffic hours to minimise congestion and disturbances to the road network.
- Suppliers and contractors will be informed of designated traffic routes to mitigate construction-related traffic issues in the vicinity.
- The yard will be kept clean and unobstructed, with a road sweeper available through leasing as needed to prevent mud from accumulating on public pathways and access roads.
- All loading of materials will occur within the work site and behind barriers to further reduce congestion.
- To enhance environmental and road safety, all material containers, such as grab wagons, will be securely covered during transit to prevent road contamination.

- Vehicles and equipment on site will not have engines running unnecessarily, and the use of low-emission vehicles equipped with catalysts or diesel particulate filters will be encouraged.
- Low-sulphur fuels will be recommended for use in vehicles and machinery whenever possible.
- All equipment will be properly maintained, with routine servicing conducted according to manufacturer guidelines, and maintenance records will be kept.
- All project vehicles, including off-road equipment, will possess valid MOT certificates as required and will comply with exhaust emission standards.
- Additionally, wheel washing facilities will be provided at the yard to prevent mud from being transferred onto local roads

### 12.12. Transport, Delivers & waste control

The responsibility for the safe transportation of personnel and the loading of materials to and from the construction site lies with the driver. Compliance with the regulations set forth by transport authorities, the environmental agency, local authorities the highway agency, the DVLA, road traffic police, and other emergency services is mandatory at all times.

### 12.13. Visitors

All visitors to site must report to the supervisor or other senior person on site before entering the working area. They should follow all general health and safety environmental restrictions and rules and obey all instructions which they might receive in order to prevent injury or other harm to themselves or those around them.

Appropriate PPE will be worn by visitors at all times. This will include as a very minimum safety boot, high visibility clothing and hard hat. Other PPE will be worn as required. Spare equipment will be kept on site for the use of visitors who may not have their own.

## 13. Air Quality and Dust Management from Construction Activities

### 13.1. Emissions from vehicle

Novo Technologies employs and have several business licenses with "Velocity Fleet Management" as a comprehensive tool for vehicle tracking, environmental monitoring, and fuel consumption oversight. This technology enables key stakeholders to effectively monitor and manage trips to and from construction sites, aiming to decrease mileage and subsequently lower emissions associated with road transport activities.

We advocate for our delivery supply chain to adopt similar planning and coordination efforts to minimise their emissions. There is no justification for drivers to keep their vehicles running while stationary on-site. This approach will help reduce the frequency of deliveries, lower vehicle emissions, and enhance the air quality in surrounding neighbourhoods.

### 13.2. Emissions from Construction on site activities

Novo Technologies recognises the importance of minimising dust emissions from construction activities. Proposed measures to control these emissions include.

positioning machinery and dust-producing tasks away from sensitive areas.

Implementing smart procurement practices will help reduce the frequency of deliveries, thereby lowering vehicle emissions and preserving local air quality.

Site management aims to limit cutting and grinding operations, and when necessary, subcontractors will be required to utilise water suppression techniques, preferably with water-efficient spray pumps, to mitigate dust generation during these processes. Additionally, site management will ensure that materials such as cement, sand, and fine aggregates are properly sealed after use.

Regular cleaning of mud and debris will be conducted to prevent dust formation as it dries. All personnel involved in activities that may release silica dust will receive training on silica awareness and must undergo face fit testing during project induction, wearing appropriate P3 masks. Site transport generating significant dust levels must adhere to the following measures: the implementation of a prevention hierarchy is essential, which includes ensuring adequate ventilation or utilising a water suppression system. If neither of these options can be applied, individuals exposed to the dust are required to wear Respiratory Protection Equipment (RPE) and possess a valid face fit testing certificate.

## 14. Pollution, Prevention and hazardous material storage


During the construction phase of the project, various chemicals and hazardous materials, including fuels and lubricants, may be stored on-site. These materials encompass diesel, petrol, oils, lubricants, line marking paint, concrete, and bitumen reinstatement. To ensure compliance with the Water Resources Act (1991) section 85 and its associated regulations, appropriate measures will be developed, implemented, maintained, and monitored.

The following measures will be established to prevent pollution and align with the best practice policies recommended by the Environment Agency through the Pollution Prevention Guidelines (PPG 1, 6, 13, 22): "Working at construction sites" & Vehicle washing & Cleaning

Drip trays are utilised to capture leaks from diesel or petrol vehicles and stationary equipment. Pollution control procedures are developed in accordance with the Environment Agency's Pollution Prevention Guidelines, accompanied by relevant training for all construction personnel. Additionally, spill containment equipment, including absorbent materials, is made available on-site, and in Vehicles such as spill kits and generator nappies.

Pollution Prevention Guidelines (PPGs) are established in accordance with applicable legislation and embody best practices in the field. While certain pollution prevention guidance documents have been archived or withdrawn, (PPG 6) the information contained within some of these documents remains relevant and effective for preventing pollution. Below is a link too all of the current Pollution Prevention guidance documents.

Pollution prevention advice and guidance (PPG)

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All sub-contractors must be familiar with and apply the relevant best practice listed in the above guidance documents.

The Environment Agency incident hotline number is 0800807060

#### 14.1. Storage of Fuel for plant

Novo Technologies has previously collaborated with GAP, our insurance broker, underwriter, and landlord, to establish facilities for fuel storage dedicated solely to refuelling equipment. A comprehensive risk assessment is essential, along with personnel training focused on the safe handling and storage of fuel.

All fuel and oil will be stored in compliance with the Control of Pollution (Oil Storage) (England) Regulations 2001, ensuring that pollution risks are minimised.

This includes ensuring that fuel and oil storage tanks meet regulatory standards and are secured when not in use. Storage locations will be situated at least 10 meters away from watercourses or highway gullies. Mobile bowsters will be bunded and locked when not in operation. Drums will be kept in bunded areas with a capacity of at least 25% of the total volume or 110% of the largest container, whichever is greater, and will be properly maintained by GAP, sealed, and labelled.

Only trained personnel will perform refuelling tasks, while static combustion engine equipment will be either integrally bunded or placed on drip trays.

Regular inspections for leaks and maintenance of plant equipment will be conducted, and spill kits will be readily available near storage areas, with operatives trained in their proper use.

### 15. Community Liaison including complaints procedure

Given the site's location within residential neighbourhoods, it is essential to ensure ongoing communication with those potentially impacted by the project to foster positive community relations throughout its duration.

Maintaining strong relationships, facilitating effective communication, and employing strategies to minimise disruption are critical components of the project's successful management.

The following actions will be undertaken: a courtesy board displaying the company name, permitting details, and a contact number will be installed.

- an F10 notification certificate will be provided
- site working hours will be clearly posted.
- and proactive communication, including notices for upcoming works that may cause disturbances, will be implemented through local community meetings and letter distributions.

A display board shall be prominent and shall detail the nature of the works being undertaken, a contact name and telephone number (including a telephone number to be used outside normal working hours)

A complaints register shall be kept and shall include complainant's details, date and time of the complaint, cause(s) of the complaint, action taken to resolve the complaint, date and time of action taken to resolve the complaint, and reasons for any unresolved complaints.

## 16. Monitoring and CEMP Reviews

### 16.1. Environmental monitoring

Regular assessments of environmental performance will take place throughout the development process. This approach will facilitate the evaluation of the effectiveness of implemented environmental measures and compliance protocols, enabling the identification of any areas that may be lacking. Consequently, this will allow for timely corrective actions to enhance environmental protections and improve overall results.

### 16.2. Inspections

Routine inspections will be conducted across all construction activities and work sites to ensure adherence to this CEMP and relevant regulatory requirements. The findings from these inspections will be documented as part of the health and safety auditing process.

### 16.3. Incident and or event-based inspections

Event-based inspections will be carried out by the Construction Manager in response to significant occurrences, including substantial rainfall that leads to runoff, strong winds, the receipt of environmental complaints, the issuance of non-compliance reports, or any exceedances in monitoring results. These inspections will be documented on a inspection form that outlines the reasons for the inspection, observations made, findings, and the outcomes. All records should be maintained, and any necessary actions should be completed and closed out.


### 16.4. Performance and Progress meetings

A routine progress meeting will be conducted with stakeholders and subcontractors to review construction updates and ensure that control measures are functioning effectively.

### 16.5. CEMP Review

The CEMP serves as a dynamic document, with the on-site project team responsible for the effective implementation and ongoing monitoring of the outlined controls. Should these controls fail to meet their intended goals, adjustments will be made accordingly. Following the implementation of any changes, the CEMP will be updated to reflect the revised environmental controls, ensuring alignment with regulatory requirements and compliance with planning approval conditions.

**End of Document**

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## 17. Appendix A – Abbreviations

Abbreviation	Full Description
ArcGIS	ArcGIS is a comprehensive geospatial platform for professionals and organisations. It is the leading geographic information system (GIS) technology. Built by Esri, ArcGIS integrates and connects data through the context of geography. It provides world-leading capabilities for creating, managing, analysing, mapping, and sharing all types of data.
BS	British Standards
CEMP	Construction Environmental Management Plan - A plan by Novo describes how the environmental impacts of construction activities of a project will be minimised and mitigated
Conservation Area	An area of special environmental or historic interest or importance, of which the character or appearance is protected by law against undesirable changes (Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
COSHH	Control of Substances Hazardous to Health - Under the Control of Substances Hazardous to Health Regulations 2002, employers need to either prevent or reduce their workers' exposure to substances that are hazardous to their health
EA	Environment Agency - A non-departmental public body with responsibilities relating to the protection and enhancement of the environment in England.
EMS	Environment Management System
ESG	Environmental Sustainability group
Fibrus HSQE Hub	A cloud base application bespoke to Fibrus used for reporting all incidents and managing HSQE reporting, non-conformances
MAGIC	Multi-Agency Geographic Information for the Countryside - A web-based interactive map to bring together information on key environmental schemes and designations in one place. Multi-Agency Geographic Information for the Countryside (MAGIC) is a partnership project involving six government organisations who have responsibilities for rural policymaking and management.
SSSI	Site of Special Scientific Interest - A conservation designation denoting to a protected area in the United Kingdom. The Sites are protected by law to conserve their wildlife or geology.