

Construction Environmental Management Plan

PF10-PR10-43-F001

Project: West Cumberland Hospital,
Whitehaven (Phase 2)

Site Code: JW22



North Cumbria
Integrated Care
NHS Foundation Trust



GRAHAM are committed to supporting the UN Sustainable Development Goals, a blueprint to achieve a more sustainable future for all.

Version No: 3.0

Date Published: 10/03/2021



Document Details:	
Project Title	West Cumberland Hospital, Whitehaven (Phase 2)
Document Reference Number	WCHP2-CEMP-001
Document Status	Developed for Construction

Document Preparation Details:			
	Name	Role	Date
Prepared by	David O'Hagan	Regional Environmental Manager	13/07/2021
Approved By			
* Accepted By			

*Optional acceptance by client representative

Version History:			
The Environmental Manager and Project Manager will work collaboratively to conduct periodic reviews of this document to ensure that the information contained within it, is suitable and sufficient for site operations. It is anticipated that this will be carried out at least every six months.			
Version	Date	Summary of details	Approved by
Draft	13/07/2021	Developed to discharge planning conditions	David O'Hagan
Rev A	11/02/2022	Developed for use during the construction stage	Damian McCabe / David O'Hagan

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Version No: 3.0

Date Published: 10/03/2021

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SECTION 1.0 Organisational Arrangements

Guidance Notes:

The information contained in this section describes the Environmental Management processes adopted on site.

1.1.1. Introduction

This document has been prepared by GRAHAM. In preparing this document GRAHAM is demonstrating their commitment to being an environmentally responsible company. This Construction Environmental Management Plan (CEMP) forms part of an overall environmental management system and is to be read in conjunction with the Construction Phase Plan and the Quality Plan for the Project.

This CEMP is intended to satisfy the requirements of the principles set down in the International Environmental Management System Standard ISO 14001:2015. Our policies and procedures described within this document are in compliance with relevant legislation and best practice guidance.

In preparing this document GRAHAM have drawn on information contained in the following documents:

- Preliminary Ecological Appraisal for BREEAM – West Cumberland Hospital, Phase 2 – AECOM (November 2019)
- Ground Investigation Report – West Cumberland Hospital – Curtins (March 2021)
- Ground Investigation Report – WCH – Curtins – (December 2021)
- Drainage Strategy Addendum – WCH – Curtins – (October 2021)

1.2. Scope of Project

The project consists of the Phase 2 New Build

This is the second phase of development of the West Cumberland Hospital. Its aim is to deliver the vision of creating a modern, state of the art 'Full integrated Health Campus' within the region of West Cumbria. In 2015, Phase 1 of the WCH redevelopment was completed at a cost of £110m.

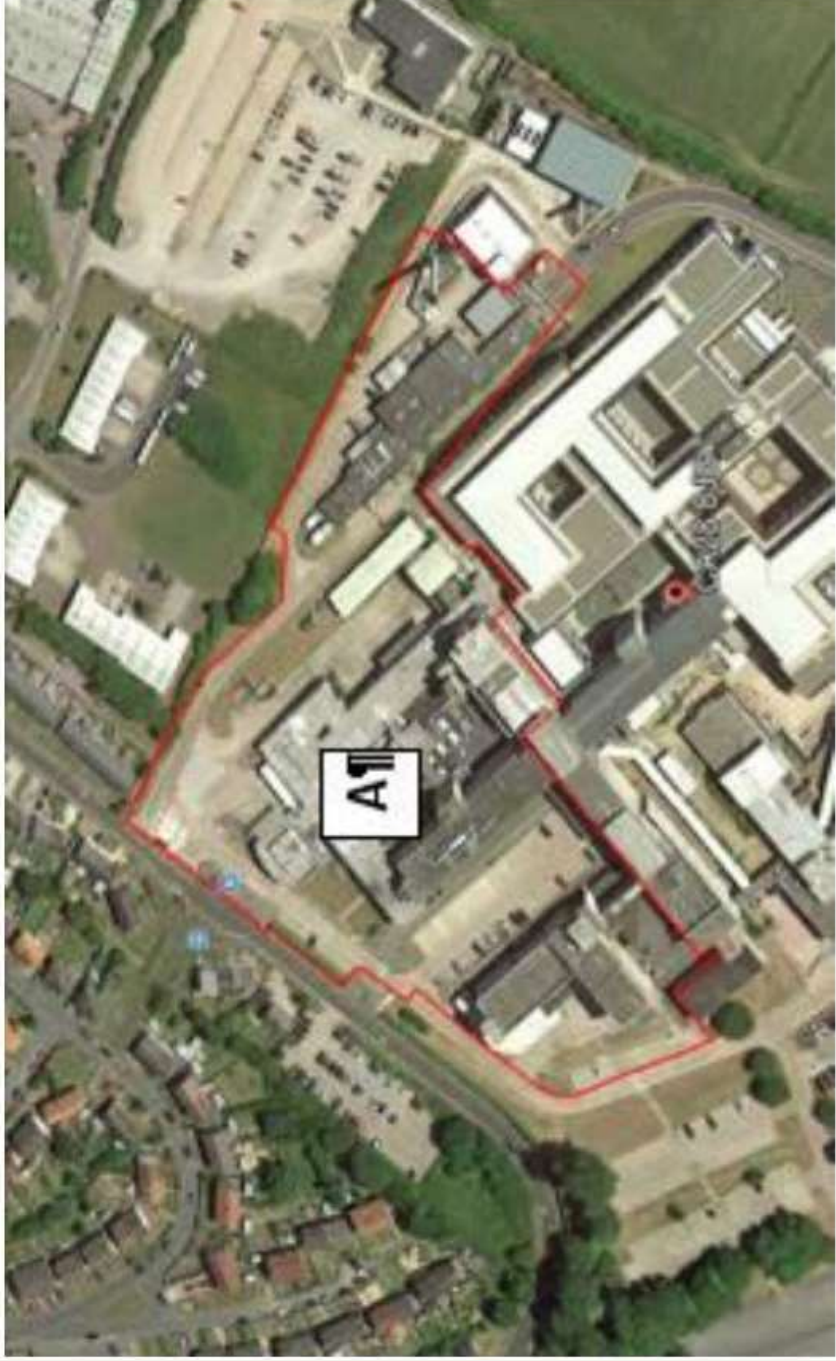
The two storey Phase 2 extension will comprise of 4,200sqm of accommodation including a new main entrance, a new retail space and new clinical accommodation for services currently spread over the existing hospital site.

In summary, the second phase will comprise of the following:

- 32 bed In-patient Ward (Step Down & Palliative Care) Level 3
- 14 bed Paediatric Ward. (level 4)
- 24 bed In-patient ward (level 4)
- Admin and Support Spaces
- Ground Floor Retail opportunity
- Shared Physiotherapies Suite
- A new compliant Changing places toilet

1.3. Site Location and Context

The site is located at central grid reference NX 98942 16116 and previously comprised of buildings associated with an infirmary including wards, workshops, residences, green spaces, and car parks. The demolition of these existing buildings has already been completed and site left available for construction to start. The site is bordered to the north and west by residential dwellings and industrial complexes and to the south and east by agricultural lands primarily utilised for crop rearing and animal husbandry.



1.4. Purpose and benefits of the plan

- The plan defines the Environmental Management procedures, work practices and management responsibilities relating to the construction of the project.
- The plan demonstrates how GRAHAM intends to satisfy the requirements of the client
- The plan demonstrates how GRAHAM intends to produce environmental performance indicators
- The Plan defines the scope of environmental issues, together with the requirements for action by GRAHAM that shall be set out to avoid, minimize and mitigate construction effects on the environment, existing surrounding communities and new residents of the local area
- The plan sets out the individual responsibilities of Directors, Managers, Supervisors and Operatives, with their respective roles defined in a clear system of managerial control.
- The plan establishes the structure and content for the procedures to monitor compliance, including specific auditing by GRAHAM.
- The plan establishes a regular procedure for reporting environmental information and ensures that environmental issues are firmly on the agenda of progress review meetings.
- The plan ensures that complete documented records are kept for easy, accessible reference.
- The plan provides a statement of Intent to statutory, regulatory and local authorities to take effective action to work in compliance with all statutory provisions and protect the environment.

The CEMP is a live document which must be updated and developed throughout the course of the project. An update to the CEMP will be carried out every six months as a minimum

1.5. GRAHAM Environmental Strategy and Climate Action Strategy

As part of the GRAHAM 2021 Environmental Strategy and Climate Action Strategy, this project will seek to adopt solutions and opportunities which will positively impact upon our four key areas of Environmental Sustainability focus (as follows):

- **Protecting the Environment**
- **Environmental Management and Improvement**
- **Conserving Resources**
- **Climate Action**

The GRAHAM overarching commitment to working in support of the UN Sustainable Development goals will also underpin the Project ethos toward “Sustainable Development” and opportunities will be sought to positively influence the SDG’s.



Figure 1 - Climate Action Strategy

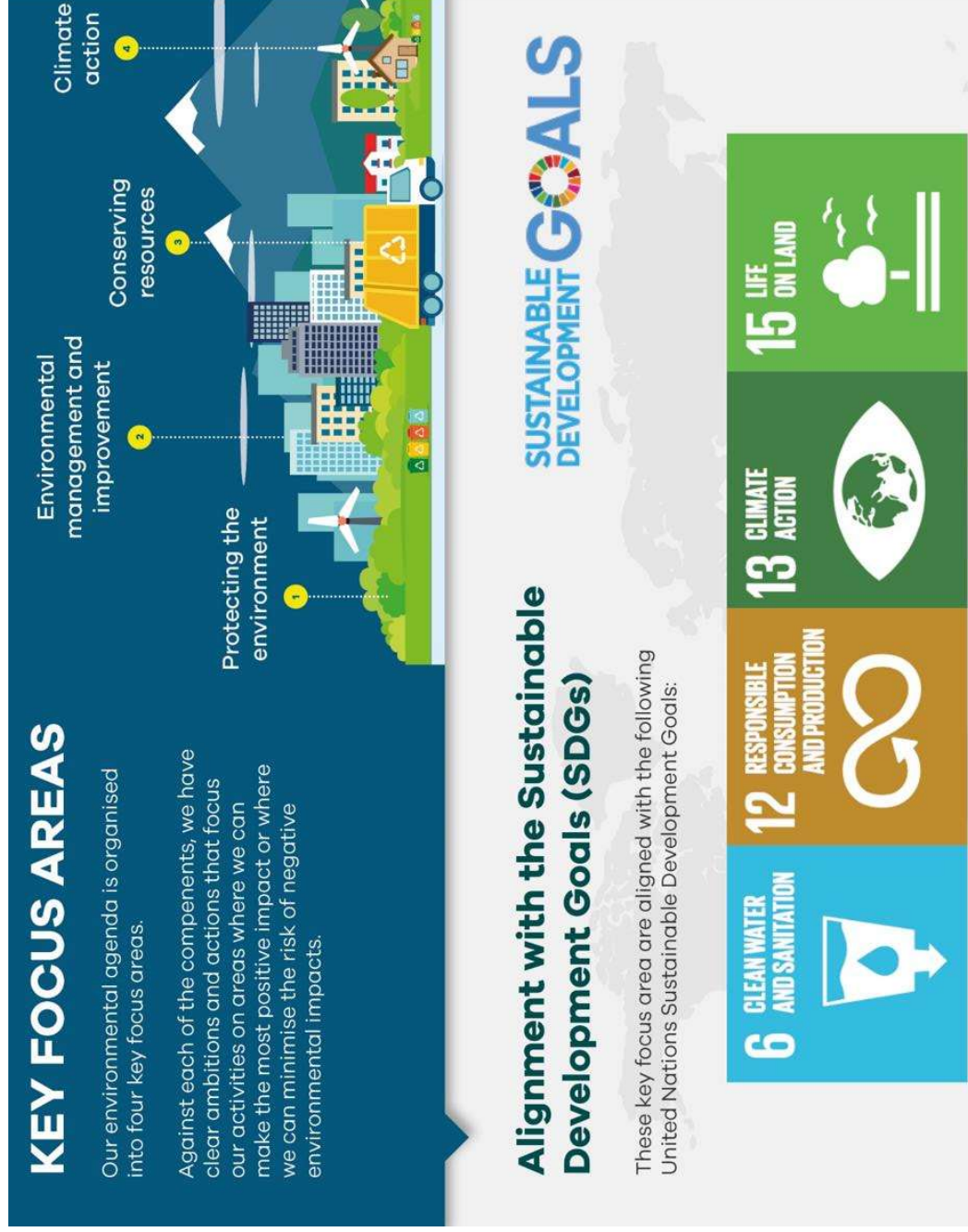


Figure 2 - Key Focus Areas

1.6. GRAHAM Environmental Management System

GRAHAM operate an ISO 14001:2015 accredited Environmental Management System. We use this in conjunction with all relevant legal and other requirements for the environmental management of this project.

The environmental performance of the site will be regularly checked by site inspections carried out by our SHE Advisors and Environmental Audits carried out by the Environmental Manager. The implementation of our EMS will be audited both internally by our Systems Audit Manager and externally by NQA Ltd.

1.7. GRAHAM Environmental Policy Statements

The work carried out on the Project will be in compliance with:

- **GRAHAM Environmental Policy Statement**
- **GRAHAM Biodiversity Policy Statement**
- **GRAHAM Climate Action Policy Statement**
- **GRAHAM Green Travel Policy Statement**
- **GRAHAM Waste Management Policy Statement**

1.8. Objectives and Targets

As part of our commitment to continually improve our environmental performance, specific targets and objectives relating to the Project are as follows:

FOCUS AREA	AMBITION	ORGANISATIONAL TARGET	PROJECT TARGET	MEASUREMENT
CLIMATE ACTION	To eliminate carbon from our business and to measure and manage our progress towards a decarbonised economy	Net-zero carbon emissions by 2045 & decrease carbon emissions by 50% by 2030.	Site carbon emissions to remain less than or equal to: 10.25 TCO2e/£1M <i>(For 2021/22)</i>	tCO2e/£1M
ENVIRONMENTAL MANAGEMENT AND IMPROVEMENT	To manage our business in such a way as to aid improvement in environmental performance in the workplace	Ensure that the GRAHAM Environmental Frequency Rate is maintained at less than 0.02.	Submit at least one environmental observation per month	Percentage of sites that have submitted at least one environmental observation each month
CONSERVING RESOURCES	To have a net positive impact on resources and ensure the implementation of the principles of the circular economy by keeping products and materials at their highest utilisation throughout their lifecycle	To: a) reduce the quantity of construction waste generated by 50% by 2030 b) reduce mains water consumption by 50% by 2030	a)Site construction waste to remain less than or equal to: 31T/£1M b)Site mains water consumption to remain less than or equal to: 56M3/£1M <i>(For 2021/22)</i>	a) Tonnes of construction waste/ £1m b) M3 per £1m
PROTECTING THE ENVIRONMENT	To proactively manage ecological issues and contribute towards the protection and enhancement of natural assets in order to support wellbeing and help climate proof our communities	Increase the number of biodiversity actions by 50% (against a 2019/20 normalised baseline) by 2030	Undertake at least two biodiversity actions per annum	Percentage increase from baseline year (measured in actions/£50m)

1.9 Environmental Roles and Responsibilities

- An organisational chart is shown within the Construction Phase Plan
- The table below details the environmental duties and responsibilities for positions identified in the organisation chart
- The environmental qualifications for positions identified are detailed within the relevant CV's included within the Construction Phase Plan

Name	Responsibilities
Contracts Manager Damian McCabe	<ul style="list-style-type: none"> • Assign specific environmental duties to competent members of the Project Team • Identify the environmental training needs of personnel under their control and arrange appropriate training programmes and ensure records are being maintained • Ensure that significant environmental aspects identified for the project are managed • Promote the continual improvement of environmental performance
Project Manager John Deegan	<ul style="list-style-type: none"> • Ensure that the CEMP is produced, maintained and implemented on the project and distributed to all relevant parties • Ensure that all personnel for whom they are responsible are aware of the CEMP and implement the relevant requirements • Identify the competence of all subcontractors and suppliers and ensure that they are made aware of, and comply with, the Project Plans and any documentation requirements • Establish a consultation and communication system with all relevant interested parties associated with the project, including employees, partners, contractors, clients, designers and third parties, etc., where relevant
Site Manager TBC	<ul style="list-style-type: none"> • Ensure that all personnel undergo suitable and sufficient environmental induction before starting work on the project • Ensure that staff are attending the appropriate environmental courses that are organised by the Environmental Manager. Ensure the Environmental Manager is maintaining records • Monitor the performance of personnel and activities under their control and ensure that arrangements are in place so that all personnel can work in a manner which minimises risks to themselves and to the environment • Undertake a programme of regular project environmental inspections in accordance with procedures • Implement the environmental performance measurement, review and reporting requirements • Assist and support the Environmental Manager when pollution investigations are required • Co-operate with auditors during environmental audits and action any non-conformances

<p>Site Engineers Henry Rodgers</p>	<ul style="list-style-type: none"> • Ensure all environmental issues within their designated work area are identified and noted in the method statements if applicable • Liaise with Environmental Manager to ensure any environmental issues are dealt with swiftly and correctly • Issue daily task talks when environmental best practice is not utilised • Liaise with Environmental Manager when approaching subcontractors regarding environmental issues • Ensure environmental mitigation drawings are reviewed prior to works commencing • Ensure any environmental incidents are recorded and the associated procedure is followed • Read the Environmental Management Plan prior to works commencing
<p>Procurement Manager Gordon Morrow / Colin Ferguson</p>	<ul style="list-style-type: none"> • Ensure that materials are ordered so that the quantity delivered, the timing of the delivery and the storage does not create unnecessary waste
<p>Environmental Manager David O'Hagan</p>	<ul style="list-style-type: none"> • Implementation of the CEMP Procedures • Liaise with the Engineering Manager to ensure all environmental aspects and requirements are included in the design • Draw up the CEMP to ensure all aspects, impacts, statutory requirements and Client commitments are reflected in the plan • Maintain and audit the CEMP and the documents which underpin it • Undertake a programme of regular project environmental inspections, monitoring, recording and reporting in accordance with procedures • Liaise with the Project Manager to ensure that the works are constructed in line with the CEMP • Liaise with the employer's environmental advisors, statutory bodies and the local community as required • Attend regular construction meeting to ensure environmental issues are discussed with the appropriate management • Comply with GRAHAM environmental incident investigation and reporting procedures • Chair Review Meetings involving relevant stakeholders and the Project Team • Support and provide training to the workforce with regard to understanding environmental aspects, impacts, regulatory requirements, best practice, constraints and methods of working
<p>Design Co-ordinator: Simon Gibson</p>	<ul style="list-style-type: none"> • Be fully aware of the project environmental aspects in general and of their specialty in particular • Ensure the works are carried out to agreed working methods and procedures and to the required standard of quality • Train and educate the workforce with regard to best practice, constraints and methods of working • Liaise with Environmental Manager to ensure any environmental issues are dealt with swiftly and correctly

<p>Project Ecological Consultant Sarah Parkin – SAP Ecology</p>	<ul style="list-style-type: none"> • Monitoring site works • Provision of status reports and updates • Provision of advice to and liaison with workers on site • Identify environmental risks and develop environmental controls • Delivery of environmental training for site personnel and sub-contractors • Liaison with the Site Team
<p>Subcontractors</p>	<ul style="list-style-type: none"> • Provide evidence during procurement process to demonstrate commitment to the environment • Ensure all staff read the CEMP • Provide environmental mitigation required during their works • Appoint a member of staff responsible for coordinating environmental impacts and aspects • Ensure risk assessments address environmental issues associated with their works

Note - GRAHAM will notify the Employers Representative of any intended changes in personnel with core environmental responsibilities.

1.10 Competence, Training and Awareness

- The table below details the Environmental Competency and Training Plan for those personnel that will be employed on the Project
- Records of competency requirements and training will be maintained by the GRAHAM SHE Training department using an advanced training software tool which prompts in advance of refresher training requirements.
- A description of the training that will be delivered is outlined overleaf

ENVIRONMENTAL TRAINING MATRIX																			
Period of Validity (years)	Company SHE Induction	Site Specific SHE Induction	Site Introductory Environmental Advisory Training	SHE Briefing	Spill kit Training	Environmental Champion Training	Environmental Advice Notes	Environmental Toolbox Talks	CIRIA / NEBOSH Award / SEATS one day environmental awareness training	NEBOSH Certificate in Environmental Management (for equivalent)	Leading with Environmental Sustainability (IEMA Certified)	Graduate Environmental Management Training Session	Supply Chain Briefing	Fuel efficient driver training	E-Learning Training courses				
	N/A	N/A	N/A	1	3	3		N/A	5	N/A	5	N/A	1	3	Introduction to Biodiversity	The Circular Economy	Introduction to Environmental Management	Introduction to Sustainable Construction	Introduction to Climate Change and Carbon
Regional Director	C	C	N/A	C	N/A	N/A	C	N/A	N/A	N/A	C	N/A	N/A	D	D	D	D	D	D
Contracts Manager / Director	C	C	N/A	C	N/A	N/A	C	N/A	N/A	N/A	C	N/A	N/A	D	D	D	D	D	D
Project Manager	C	C	RS	C	N/A	N/A	C	N/A	RS	N/A	N/A	N/A	N/A	D	D	D	D	D	D
Site Manager / Agent	C	C	C	C	RS	RS	C	N/A	RS	N/A	N/A	N/A	N/A	D	D	D	D	D	D
Site / Section Engineer	C	C	C	C	C	RS	C	N/A	RS	N/A	N/A	N/A	N/A	D	D	D	D	D	D
Graduate Engineer	C	C	C	C	C	RS	C	N/A	RS	N/A	N/A	C	N/A	D	D	D	D	D	D
Foremen/ Supervisor/ Ganger	C	C	RS	C	C	RS	C	C	RS	N/A	N/A	N/A	N/A	D	D	D	D	D	D
Environmental Champion	C	C	C	C	C	C	C	N/A	C	RS	N/A	N/A	N/A	D	D	D	D	D	D
SHE Professional	C	C	C	C	C	RS	C	N/A	RS	C	N/A	N/A	N/A	D	D	D	D	D	D
Plant Operatives/ Labourer	N/A	C	N/A	N/A	RS	N/A	C	C	N/A	N/A	N/A	N/A	N/A	D	D	D	D	D	D
Site Support Staff e.g. commercial, design etc.	C	C	N/A	C	N/A	N/A	C	N/A	N/A	N/A	N/A	N/A	RS	D	D	D	D	D	D
Procurement Officer	C	RS	N/A	C	N/A	N/A	C	N/A	N/A	N/A	N/A	N/A	C	D	D	D	D	D	D
Office Based Employee	C	RS	N/A	C	N/A	RS	C	N/A	N/A	N/A	N/A	N/A	N/A	D	D	D	D	D	D

Key
C - Core Training - always required for this role
RS - Role Specific Training
D - Desirable training course

Figure 3 - GRAHAM Environmental Training Matrix

Description of training

Environmental Training	Description	Delivered by
Company SHE Induction	All members of staff receive a company induction which includes an introduction to the key aspects of the Environmental Management Systems within GRAHAM	HR Team
Site Specific SHE Induction	All site operatives are given site specific environmental information through the induction process	Designated member of the site team
Initial Environmental advisory/ communication training	Appropriate members of the site team receive an initial environmental advisory briefing. Key environmental aspects of the project are communicated at this stage	Environmental Team
SHE Briefing	Members of the site team attend an annual briefing which highlights areas of good practice, legislation changes and any new company initiatives	SHE Team
Spill Kit Training	Site teams are given practical training on the legal requirements regarding fuel storage, potential damage caused by such a spill, GRAHAM's spill procedure, measures to prevent spills occurring and practical training in the use of spill kits	Designated member of the site team / Environmental team
Environmental Champion Training	Specific member(s) of the site team are assigned the environmental champion role. Training is provided to highlight their roles and responsibilities in managing environmental aspects onsite	Environmental Team
Environmental TBTs / Advice Notes	Environmental tool box talks and advice notes are given on a regular basis to reinforce and further emphasize site environmental issues	Designated member of the site team
CIRIA / NEBOSH Award / SEATS - one day environmental awareness training	Environmental Champions attend a one day externally delivered environmental awareness course. This course provides an introduction to environmental issues and outlines mechanisms to improve site environmental performance.	External body
NEBOSH Certificate in Environmental Management (or equivalent)	Relevant SHE team members attain environmental management qualifications which are professionally certified in order to deliver a high level of environmental expertise	External body
Leading with Environmental Sustainability	Senior Management attend training which challenges leaders to formulate a strategic understanding of the risks and opportunities presented by a changing environment on their ability to do business	External body
Graduate Environmental Management Training Session	Graduates attend classroom based training to provide them with an overview of the GRAHAM Environmental Management System	Environmental Team
Supply Chain Briefing	Key suppliers attend a briefing delivered in order to communicate environmental information relevant to their operations	SHE Team
Fuel Efficient Driver Training	High mileage drivers attend a practical driver training course in order to improve fuel efficiency through driving style	External body

Additional E-Learning Training courses

Environmental Training	Description	Delivered by
Introduction to Biodiversity	This training explains the principles and benefits of Biodiversity, and explains the opportunities of enhancing wildlife in the built environment	SCSS e-learning
The Circular Economy	This training introduces the concept of circular rather than linear economies	SCSS e-learning

Introduction to Environmental Management	This training provides an overview of Environmental Management	SCSS e-learning
Introduction to Sustainable Construction	This training introduces the principles of sustainability, sustainable development and sustainable construction	SCSS e-learning
Introduction to Climate Change and Carbon	This training provides an overview of Climate and Carbon	SCSS e-learning

1.1.1 Internal Communication

All staff and contractors will be informed of the content and location of this CEMP and associated controls. The induction of all new employees and contractors will include the contents of this plan and the Environmental Incident Response Procedure. Method Statements will be used to communicate specific environmental requirements as appropriate.

The Environmental Manager will have responsibility for communicating any changes in policy, procedure or legislation.

The Site Manager will have responsibility for maintaining internal communication, including changes to material on display.

The GRAHAM Environmental Policy (Section 1.7) and other appropriate environmental information will be displayed on all notice boards.

1.1.2 External Communication and Managing Neighbours

GRAHAM will organise regular progress meetings with the Employer's Representative at agreed frequencies. The meetings will include an update on risk mitigation, progress against targets and a review of any audit/ assurance monitoring findings.

GRAHAM will maintain a record of discussions held with statutory authorities.

The GRAHAM Site Team will agree with the Employer's Representative how those affected by the works will be consulted, informed and mitigated of the consequences of the work. This is likely to include informing local residents and stakeholders (both verbally and in writing) of activities that may cause an impact or nuisance.

1.1.3 Records and Documents

- Copies of all licences, consents, permits or permissions granted to GRAHAM (as shown in section 1.14) will be retained on site
- Upon completion of the contract, final versions of the CEMP, operational controls and all other documents that record the environmental risks, best practice examples, mitigation measures, commitments, incidents and other relevant information for inclusion in the Health and Safety File/ O&M manuals will be provided to the Employers Representative

1.14 Permissions, Consents and Licences

Consents have been sought from the following agencies in relation to the works:

Type of Consent	Governing Body	Consent Required	Responsibility and Timescale For Obtaining	Details of Conditions	Responsibility for Discharging Requirements
Environmental Permit: Discharge to surface water or groundwater	Environment Agency	Not required	N/A	N/A	N/A
Environmental Permit or Waste Exemption: For using, treating, disposing or storing waste	Environment Agency	Not required	N/A	N/A	N/A
WI Act temporary discharge consent	Local water company	Yes	Site Manager – Prior to commencement on site	N/A	Site Management Team
Planning permission for site compound	Copeland Borough Council	Not required	N/A	N/A	N/A
Hedgerow removal notice	Copeland Borough Council	N/A	N/A	N/A	N/A
European Protected Species Licence e.g. bats/ badgers/ great crested newts	Natural England	Not required	N/A	N/A	N/A
Scheduled Monument Consent	Environment Agency	Not required	N/A	N/A	N/A
Consent to work in SSI, SAC, SPA, RAMSAR	Environment Agency	Not required	N/A	N/A	N/A
Tree Preservation Order Consent	Copeland Borough Council	Not required	N/A	N/A	N/A
Listed Building consent	Copeland Borough Council	Not required	N/A	N/A	N/A
Planning permission for “relevant demolition” in conservation areas	Copeland Borough Council	Not required	N/A	N/A	N/A
Section 61 of the Control of Pollution Act (Noise and Vibration from Construction)	Copeland Borough Council	Not required	N/A	N/A	N/A

Note: Specific controls as a result of these consents will be implemented by detailing the requirements in the associated Method Statements, together with any specific records to be generated as necessary to show compliance. Regular toolbox talks will be held on these specific controls throughout the execution of the works

1.15 Monitoring of Construction Activities

Environmental performance is monitored through the following activities:

1. Completion of the Weekly Site Supervisors Environmental Report – (IMS Ref: PF10-PR10-46-F016)
2. Inspections carried out by the SHE Team
3. Environmental Audits carried out by the Environmental Manager – (IMS Ref: PF10-PR10-40-F002)
4. Review of Site Waste data, Carbon Impacts, Water Consumption and Biodiversity Actions (on Cora)
5. Noise and vibration monitoring (as necessary)
6. Water quality monitoring (as necessary)

Environmental performance will also be a regular item included on the agenda for Progress meetings

1.16 Auditing of Construction Activities

The methodology for auditing of construction activities includes but is not limited to:

- ❖ A review of documentation including the CEMP, environmental risk assessments, method statements, permits and licences
- ❖ A site visit which includes inspection of on-site waste skips, stockpiles, fuel storage arrangements and any nearby watercourses
- ❖ Discussions with the site team
- ❖ A report which includes findings and prioritised recommendations is then drafted by the auditor for actioning by the Site Manager

Details of the nominated personnel to conduct audits, report back and action mechanisms are as follows:

- ❖ Lianne Taylor – Head of Environment**
 - ❖ David O’Hagan – Environmental Manager**
 - ❖ Rosie Barnett – Environmental Manager**
 - ❖ Jayne Walker – Environmental Manager (Civils) **
 - ❖ John McGrory – Environmental Manager (Building North) **
 - ❖ Keith O’Flynn – Project Environmental Manager**
 - ❖ Andrew Cooke – SHE Director
 - ❖ Robin Fleming – Head of Health and Safety (Building South and Interior Fit-Out)
 - ❖ Chris Murphy – SHE Manager (Civils)
 - ❖ George Mills – Regional Health and Safety Manager (Building North)
- **Main Auditors*

The nominated auditors will ensure any areas of improvement are identified to the Site Manager and will undertake a follow up to ensure that this improvement has taken place. Results of the audits will be made available to the Contracts Manager for information.

1.17 Identification of Aspects and Impacts (Project Environmental Risk and Opportunities Register)

Prior to actual commencement on site, the Environmental Manager in consultation with the Project Manager will complete a site-specific Project Environmental Risk and Opportunities Register in order to identify the relevant environmental aspects and impacts associated with the works. This risk register will outline the controls that must be put in place to manage any significant adverse environmental impacts to acceptable levels. (IMS Ref: PF10-PR10-43-F003)

1.18 Environmental Risk Assessment

As well as including Health, Safety, Welfare and Quality requirements, Work Package Plans shall include environmental risk assessments (IMS Ref: PF10-PR10-01-F003) and give consideration of the following environmental requirements:

- List of significant impacts relevant to the activity
- Identification of receptors/ resources likely to be affected by the works
- On-site monitoring arrangements
- Environmental controls for statutory nuisance aspects – noise/ dust/ fumes/ lighting
- Refuelling, repair and servicing of mobile plant
- Waste management controls
- Selected mitigation methods to minimise impacts
- A list of relevant consents
- Training and briefing requirements

Work Package Plans must be completed and filed for inspection by stakeholders, regulators and other interested parties.

Environmental Risk Assessment is an ongoing process within GRAHAM to ensure that new hazards with changing consequences and likelihoods can be identified

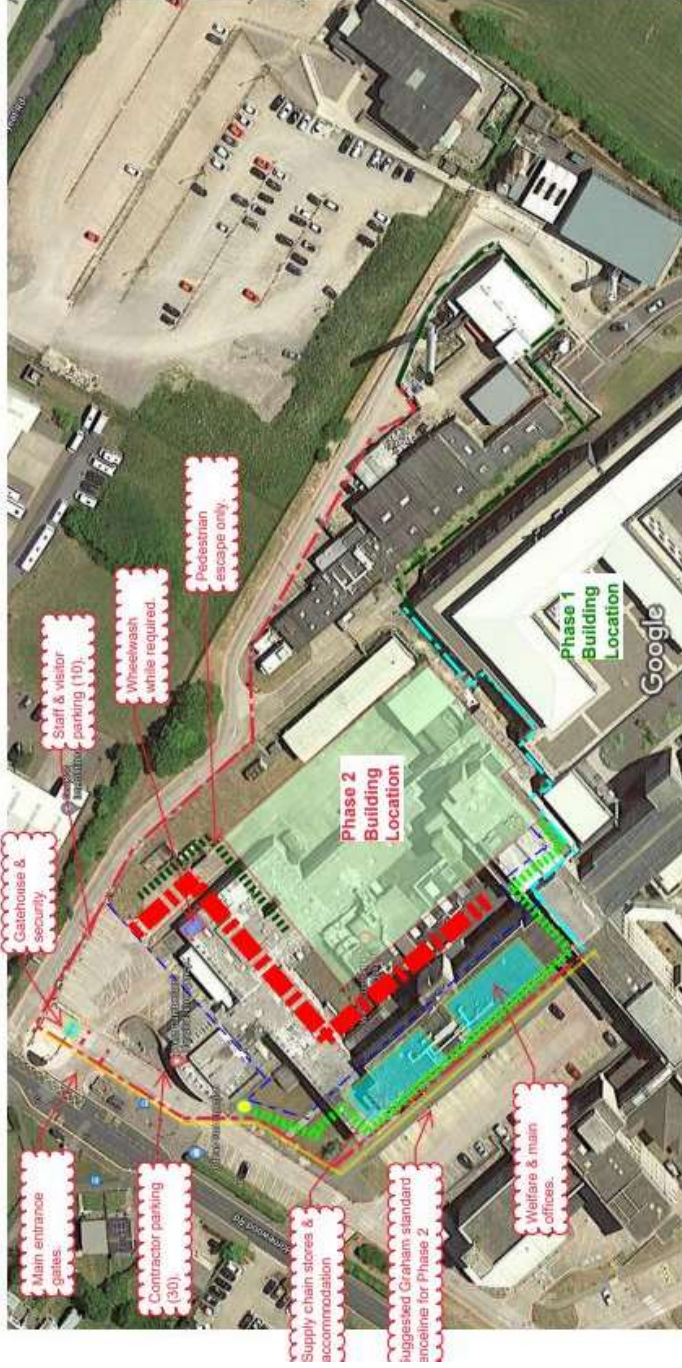
SECTION 2.0 Site Compound Layout

Guidance Notes:

Site compound and site layout drawings are included in this section. These drawings include information on:

- ❖ Provision and location of bunded refuelling areas
- ❖ Provision and location of fuel and COSHH storage areas
- ❖ Materials storage area
- ❖ Stockpile locations
- ❖ Tree protection areas
- ❖ Concrete washout provision and location
- ❖ Location of skip segregation area and details of waste segregation strategy
- ❖ Surface water and foul drainage locations
- ❖ Wheel wash measures and location
- ❖ Locations of monitoring for nuisance noise (sensitive receptors)
- ❖ Location, configuration and direction of temporary site lighting
- ❖ Details of enclosure of working areas (hoarding provision)
- ❖ Construction traffic management proposals
- Parking
- Delivery routes
- Plant movements and loading and unloading
- Storage of plant and materials
- Site access

WCH Site Red Line and Site Accommodation.



Note:- Red, green & blue dotted line indicates Phase 2 site perimeter boundary

- Herras fence type mesh hoarding by GBM.
- LOR Fasfence type hoarding.
- Phase 2 boundary abuts existing hospital building.
- Construction area segregation.
- Segregated pedestrian walkway.
- Construction traffic route.
- Biometric access control.
- Public interfacing area of suggested Graham fencing for Phase 2.
- Phase 2 building footprint, c. 59m x 44m.
- Proposed site accommodation units.

SECTION 3.0 Ecology and Biodiversity Management Plan

Guidance Notes:

This section contains details of ecological considerations (such as nesting seasons, protected species etc.) and steps required to safeguard ecology during construction.

- 3.1 Ecological Issues**
- 3.2 Existing Site Ecological Features**
- 3.3 Species Management Plans**
- 3.4 Habitat Management Plan**

3.1 Ecological issues

This section prescribes the mitigation measures which are necessary to be implemented in order to prevent or reduce adverse impacts upon ecological receptors. It also considers the legal requirements associated with statutory protected species and sites. Details of our aspirations and methodologies for the achievement of biodiversity net gain are also included.

3.2 Existing Site Ecological features

Existing Site Ecological Features, designations and potential impacts

The likelihood of the relevant ecological features constraining the Site has been appraised with reference to the habitats and species present/potentially present as identified during the Phase 1 habitat survey undertaken in July 2019.

The majority of the site is considered to have low ecological value however the buildings have been found to have some suitability for use by bats. This raises the ecological value of the site above low, unless subsequent surveys rule out any presence.

3.3 Species Management Plans

BATS

No trees with bat roost potential will be affected by the Scheme, although buildings and trees with bat potential are present on the wider hospital site and bat activity on the site has been recorded during dusk/dawn and activity surveys previously undertaken for Phase 1. There are buildings with the potential to be suitable for bats which are present within Phase 2.

These buildings have been assessed as having Negligible to Low suitability for bats and therefore some require one emergence/re-entry survey between mid May to Mid August, These surveys must be undertaken prior to the submission of any planning applications and prior to the start of works (including preparation of any buildings).

LEGISLATION

Bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Taken together, this legislation makes it an offence to:

- Deliberately capture, injure or kill a bat
- Deliberately disturb a bat in such a way as to be likely:
 - To impair its ability to survive, to breed or reproduce, or to rear or nurture its young; or
 - To impair its ability to hibernate or migrate; or
 - To affect significantly the local distribution or abundance of the species to which they belong.
- Damage or destroy a breeding site or resting place of a bat
- Keep, transport, sell or exchange, or offer for sale or exchange, any live or dead bat or any part of, or anything derived from a bat

In addition, bats are also a priority species in England as required under Section 41 of the Natural Environment and Rural Communities Act 2006. Consultation with the relevant authority is therefore required before any work is undertaken that might affect bats.

MITIGATION

General

- It will be ensured that prior to commencement of construction, a site bat survey has been undertaken in order to determine the presence of bats
- Demolition of buildings, built structures and trees with bat roost potential will only proceed once a suitably qualified bat specialist has confirmed that bats are not resident in such buildings
- All site operatives will be made aware of the possibility of finding bats during demolition of buildings, during works at built structures and during tree felling. If bats are found in properties or trees, operatives will stop work immediately and contact the Site Management Team
- Confirmed bat roost sites will not be disturbed or obstructed until a European Protected Species licence has been obtained from Natural England. Once obtained, the licence conditions for mitigation and compensation will be fully followed

Noise and Vibration

- Best Practicable Means will be adopted to ensure that noise emissions and vibration is reduced whenever practicable.

Programming

- Most of the works are scheduled to occur during bat hibernation season (between November and March), when it's unlikely that bats will be commuting across the site

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Date Published: 10/03/2021

Lighting

- All lighting will be task orientated and be kept to the minimum amount required for security/health and safety.
- Lights will be switched off when not in use, where practicable and safe to do so.
- Light spill will be minimised using adjustable column heights and/or cowls/hoods.

ENHANCEMENT

The following provisions, although not exhaustive will be considered for implementation (either on or off site) where practicable:

- Provision of additional bat boxes and artificial roosts
- Planting of trees and hedgerows in order to create corridors for bats to safely forage and travel

BIRDS

The habitats and buildings on Site offer potential habitat for breeding birds.

LEGISLATION

Wild Birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 such that it is an offence to:

- Deliberately capture, injure or kill any wild bird
- Take damage or destroy the nest of any wild bird while that nest is in use or being built
- Obstruct or prevent any wild bird from using its nest
- Take or destroy an egg or any wild bird

MITIGATION

Any necessary clearance of trees, scrub and tall herbaceous vegetation will occur outside the bird - breeding/nesting season (i.e. vegetation clearance works to be carried out between September and the following February. For reference, the breeding bird season is generally taken as the 1st March until 31st August inclusive. However, it is also noted that birds can nest at any time of the year and are therefore protected when they do.

ENHANCEMENT

The following provisions, although not exhaustive will be considered for implementation (either on or off site) where practicable:

- Provision of additional bird boxes. A minimum of three boxes should be used around the Site.
- Creation of new habitat for birds via tree planting to ensure suitable connectivity for breeding and wintering birds

3.4 Habitat Management Plan

HABITAT MANAGEMENT PLAN

EXISTING FEATURES

Any scattered trees, including adjacent but not within Phase 2, that are likely to be affected during the works should be protected by post and 'Netlon' fluorescent mesh fencing and placed at the radius of the crown of the tree.

POTENTIAL IMPACTS

<Land>

- Loss or damage to local habitats.
- Damage or destruction of unrecoverable habitats/landscapes.
- Reduction/loss of both flora and fauna species.
- Impacts on the natural ecology of local species such as bird nesting grounds, badger setts/wildlife corridors.

MITIGATION

<Land>

- On completion of construction works any areas that were unavoidably impacted will where practicable be replaced and or improved.
- Planting works will be undertaken on completion of works to ensure native species are replaced.
- Care will be taken to minimise the impact to existing vegetation and heavy plant will be confined to the site and working areas to avoid damaging soils outside the area. The removal of trees will be avoided where possible.
- A stout fence will be erected around any trees to be retained. As most damage usually occurs to the roots, the fence will enclose at least the area covered by the spread of the branches.

SECTION 4.0 Land Management Plan

Guidance Notes:

This section contains details of the steps required to safeguard the site from negative impacts in respect of Geology/ Ground Conditions/ contaminated land

- 4.1 Geology and Contaminated Land Issues**
- 4.2 Site Geology and Ground Conditions**
- 4.3 Potential sources of contamination not previously identified**
- 4.4 Potential Pathways**
- 4.5 Potential Receptors**
- 4.6 Mitigation Measures**
- 4.7 Discovery of Contaminated Land Emergency Procedure**

4.1 Geology and contaminated Land Issues

Ground contamination may be present on-site as a result of the current and historical land use(s) that have occurred. In order for ground contamination to present a risk to human health or the environment there must be pollution pathway present comprising a source, pathway and receptor.

The CLR-11 document defines the three essential elements to any risk as:

- A contaminant (or hazard) that is in, on or under the land and has the potential to cause harm
- A receptor which in general terms is something that could be adversely affected by a contaminant or hazard, for example human health
- A pathway which is a means by which a receptor can be exposed to, or affected by a contaminant or hazard

Pollution Pathway



4.2 Site Geology and Ground Conditions

Site Geology

Superficial deposits are indicated to comprise Till underlain by bedrock noted as the Hensingham Grit and Stainmore Formations, comprising sandstone and mudstone

Superficial deposits are not assigned an Aquifer designation. The bedrock is classified as a Secondary A aquifer. The site is not located within a source protection zone and there are no groundwater abstraction points within 1km of the site

Ground Conditions

Made Ground deposits were encountered in all of the exploratory holes (with exception of WS02), to base depths ranging from 0.45m bgl (BH01) to 2.50m bgl (WS05). The Made Ground generally comprised an upper layer of predominantly granular material with demolition material and the deeper Made Ground encountered as a cohesive material, likely reworked material.

No exceedances were recorded within any samples collected from made ground. Selected soil samples were screened for asbestos. No suspected asbestos containing materials (ACMs) were identified.

Note: WAC Analysis still to be carried out.

4.3 Potential sources of contamination not previously identified

Primary Sources of contaminants include tanks, site processes/operations (including combustion processes), site spillages/leaks, waste storage areas, and drainage lines.

Secondary Sources of contaminants result from the release of substances or deposition of materials from the Primary Sources, including atmospheric deposition and waste disposal.

Made ground/fill deposits and soils containing naturally occurring substances are also considered as a potential source of contaminants.

Site activities have the potential to mobilise any contaminants that exist in the ground by creating pathways or simply by providing environmental conditions that assist their development to a more toxic form.

Contaminants of concern may include a range of organic and/or inorganic substances namely heavy metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons, volatile and semi-volatile organic compounds, polychlorinated biphenyls (PCB's), asbestos and other harmful or toxic materials not mentioned above.

4.4 Potential Pathways

- Soils leaching to groundwater
- Groundwater advection
- Surface water run-off
- Migration via services and service ducts
- Migration through strata of a permeable nature
- Dermal, inhalation or ingestion
- Increased dusting levels as a result of weather conditions or construction activities

4.5 Potential Receptors

- Ecological Receptors namely; flora, fauna and the water ecosystem
- Groundwater including Minor and Major Aquifers underlying the site
- Surface Waters (controlled water)
- Buildings, building materials and services (BBMS)
- Human receptors including demolition and construction workers.

4.6 Mitigation Measures

- Works will be completed in line with planning and site investigation mitigation measures
- Measures for storage of chemicals, fuels and hazardous materials will be implemented on site (as per section 5 of this CEMP)
- A watching brief will be provided to identify and segregate potential contaminated soil
- Where any unexpected contamination is discovered, we will liaise with the local authority and experienced consultants and agree a remediation strategy for dealing with contamination

4.7 Discovery of Contaminated Land Emergency Procedure

All site personnel will be vigilant during excavating for signs of unexpected contamination. Where contamination is suspected during the works the following action will be taken

- All work must be stopped immediately.
- The Site Manager must notify the discovery to the Environmental Manager
- The area must be sealed off in order to contain the spread of contaminants.
- The site must be cleared to ensure there is nothing that could cause fire or explosion.
- The Site team must seek expert advice to identify, if appropriate and possible, the extent and cause of contamination (e.g. prior land use, spillage on site).
- If asbestos is uncovered, it should be re-covered temporarily to prevent release to atmosphere.
- A specialist contaminated land survey should be undertaken in order to determine the level of contamination and whether disposal or remediation methods are required.
- The Site Manager must complete an Environmental Incident Report on CORA.
- Good practice must be followed to remediate the land.

SECTION 5.0 Water Management Plan

Guidance Notes:

This section contains details of the steps required in order to ensure best practice with regard to the protection of water quality and water efficiency

- 5.1 Water Management Issues**
- 5.2 Existing Site Conditions**
- 5.3 General Water Management Controls**
- 5.4 Control Measures for Hazardous Substances**
- 5.5 Control Measures for Plant and Equipment**
- 5.6 Control Measures for Concrete, Cement and Grout**
- 5.7 Control Measures for Oil Storage**
- 5.8 Control Measures for Refuelling**
- 5.9 Appointed Persons for Refuelling**
- 5.10 Control Measures for Discharging Water**
- 5.11 Control Measures for Abstracting Water from Excavations**
- 5.12 Control Measures for Drainage**
- 5.13 Control Measures for Flood protection**
- 5.14 Water Efficiency**

5.1. Water Management Issues

The construction industry presents a major pollution threat to the water environment. Where harm has occurred or deemed likely to occur the regulator can either carry out works to clean up the pollution and recover costs from the Contractor, or can serve a works notice requiring the polluter to clean up the discharge at their own expense. If watercourses are polluted, or unacceptable wastes are disposed of to the sewer system, the regulatory authorities have the powers to prosecute.

GRAHAM will at all times implement working methods to protect the water environment from pollution and other adverse impacts. Our objective is to protect water quality and the ecosystems the water resources support.

5.2. Existing site conditions

The main surface water features surrounding the site is located 264m south west of the site which appears to relate to a small drain.

There are 17No. discharge consents within 1km of the site. The closest is 390m north east of the site and is operated by Copeland Athletic Stadium Trust for the discharge of surface water into a freshwater stream/river.

There are no surface water abstraction points recorded within 1km of the subject site

5.3. General Water Management controls

All work will be carried out in line with GPP5* "Works and Maintenance in or near water" in order to ensure best practice with regard to the protection of water quality.

The handling, use and storage of hazardous materials will be undertaken in line with Guidance for Pollution Prevention (e.g., GPP2* Above Ground Oil Storage Tanks).

*Applicable to Scotland/ Wales/ NI

5.4. Control Measures for Hazardous Substances

Hazardous substances are common pollutants of waterbodies and groundwater supplies which can be used for drinking water. The following control measures will be put in place on site in order to avoid the potential for contaminants from hazardous substances migrating to surface and groundwater.

All containers for hazardous substances (solid and liquid) will be leak-proof. Storage of such substances will be within impermeable, banded, secure areas, with impervious walls and floor to remove the risk of migration to groundwater or a nearby watercourse. Such storage areas will be located away from sensitive areas of the site and will be covered to prevent ingress of water. Hazardous substance stores will be clearly marked with appropriate warning signs.

Storage areas for hazardous substances will be kept tidy and we will plan deliveries to keep the amount of hazardous materials on site to a minimum

We will ensure that any water that has come into contact with hazardous materials, or is believed to be contaminated, will be stored, tested, classified and appropriately disposed of in accordance with relevant legislation.

The quantity and type of all environmentally hazardous materials will be recorded and updated weekly on the Materials Storage Inventory Form (IMS Ref: PF10-PR10-43-F006)



Figure 4 - Examples of banded and covered COSHH areas and containers

5.5 Control Measures for Plant and Equipment

Daily plant checks will be completed for all mobile plant and equipment. Particular attention will be made to checking engine fluids and hydraulic hoses. Any leaks or damage to the plant will be recorded and notified to the plant department/ hire company immediately so that the appropriate servicing can be arranged. Any items of plant/ equipment found to have any leaks will be removed from service until the fault is rectified.

Mobile Work Equipment - Pre-Use and Daily Inspection Checklist											
PF10-PR10-38-F001											
PROJECT & CODE:		WEEK COMMENCING:									
MACHINE OPERATORS NAME:		VEHICLE TYPE & FLEET NUMBER:									
Hours from Mileage End Week											
Hours from Mileage Start Week											
Total Hours Run For Week											
ALL FAILS AND DEFECTS MUST BE REPORTED IMMEDIATELY TO YOUR SUPERVISOR DO NOT USE IF UNSAFE											
				✓ If in contact		X If requires attention		N/A If not applicable			
				Mon		Tue		Wed		Thu	
SAFETY CHECKS											
All checks should be conducted in accordance with the manufacturer's manual											
1.	Wheels	Washing									
2.	Trucks, wheelbar and rails	Free from debris, cracks, nails									
3.	Running gear (where applicable)	Working									
4.	Steps and handrails	Free from defects									
5.	Light/ Rear slip indicator	Working									
6.	Light/ Rear slip indicator	Clean and free from cracks									
7.	Pressure gauges, mirrors, cameras, radar	Working/ Clean & free from cracks									
8.	Pressure gauges	Working									
9.	Working backwards	Working									
10.	Brakes - foot	Working									
11.	Brakes - hand brake parking	Working									
12.	Emergency stops (if applicable)	Working									
13.	Seat belt	Working/ No loose objects									
14.	Seat belt/ operator seating area	Working/ Free from cracks									
15.	Seat belts	Working/ chain free from coils									
16.	Seat weight adjustment	Adjustable/ good condition									
17.	Ground	Suitable for carrying loads during lift									
18.	Sliver reflectors	Working									
19.	Warning systems	Working									
20.	Spill containment/ absorbent	Working									
21.	Water levels	Within limits									
22.	Engine oil levels	Adequate									
23.	Fuel level	Working									
24.	Radiator level	Within limits									
25.	Hydraulic oil levels	Within limits									
26.	Hydraulic hoses	Free from cracks/ splits/ leaks									
27.	Windscreen wiper blades levels	Within limits									
28.	Instrument gauges/ operation controls	Working									
29.	Transmission	Working									
30.	Steering	Free from loose movement									
31.	Brakes	per operator's handbook									
32.	Gearing	per operator's handbook									
33.	Drive rope and chain systems	Free from defects									
34.	Chain links	Working/ No loose links									
35.	Clear visibility/ parabolics	Working									
36.	Spots	Free from obvious defects									
37.	Outriggers/ pins	Free from obvious defects									
Operator completing the inspection must initial here at end of each day											
Defect details											
Defect details											
Machine Operators Sign: (at end of work)											
Site Managers Sign: (at end of work)											
Date Published: 04/04/2018											
Version No. 1.0											
Page 1 of 1											

Figure 5 - GRAHAM Mobile Plant Daily Inspection Sheet

- Enviropads will be used under diesel pumps and standing plant.
- Effluent from wheels washers and plant washing facilities will be contained for proper treatment and disposal.



Figure 6 - Example of GRAHAM Enviropad in use

5.6 Control Measures for Concrete, Cement and Grout

Concrete, cement and grouts are highly alkaline and corrosive and can have a detrimental impact on watercourses. To minimise any impact:

CONCRETE WASHOUT FROM CONCRETE LORRIES

- Concrete wash water control measures will be planned and implemented before starting the project. A concrete washout risk assessment will be completed to assess the risk to receptors based upon site location and volume of concrete washout generated.
- The amount of wash water produced will be minimised and where possible and practicable, it will be returned to the batching plant
- For washwaters that cannot be returned to the batching plant, the concrete washout system utilised will (as a minimum) securely capture, contain and store the concrete solids and wash water in an impervious container/ bund.
- Washout arrangements will be located 10m away from drainage gullies, surface water drains and watercourses
- The washout area will be conveniently located for washing out equipment and adequately signposted.
- To minimise the amount of washout water generated, excess concrete will be scraped off the equipment before it is washed. These excess solids will be placed in a designated storage container.
- A high pressure, low volume water spray nozzle will be used to reduce water use
- The area will be monitored and maintained to ensure proper use and have adequate storage capacity
- Temporary concrete washouts will be designed with enough volume to contain all liquid and concrete waste.
- Plastic lining material will be a minimum of 10 mm polyethylene sheeting and will be free of holes, tears, or other defects that compromise the integrity of the material

CONCRETE WASHOUT SYSTEMS (EXAMPLES IN ORDER OF PREFERENCE)

- A. Wash into geotextile bag, collect the filtered wash out water in separate tank and arrange with concrete supplier to extract tank contents following the last pour of the day. Concrete washout water can be reused at the batching plant making more concrete. **Note: Requires submersible pump, geotextile bags and agreement with concrete supplier**
- B. Use integrated pump and waterhose to clean chute into the specific geotextile bag. This segregates the solids, and the collected high pH wash out water is stored for re-use to rinse out the next wagon's chute. **Note: Requires power connection to pump the water, geotextile bags and has capacity for 50 wagons**
- C. Combined Concrete Washout and pH adjustment System - separates and dewater the waste concrete solids and then its on-board automatic carbon dioxide pH adjustment system neutralises the high pH washwater down to (circa pH 6 to 9) limits set by the Environment Agency for discharge. **Requires: Power, consent to discharge, CO₂ gas, and water quality testing**
- D. Washout into a holding tank / skip lined with an impermeable sheet to prevent ground contamination. Mixture is allowed to cure / water evaporate **Requires: dry weather / potentially a sacrificial bag of cement**



Figure 7 - Examples of Concrete Washout Systems that may be utilised on site

ON-SITE BATCHING

- Batching and mixing activities will be located well away from watercourses and drains
- Material storage areas for all cementitious materials will be protected and covered.
- Surface drainage in the area around the batching plant will be controlled as we are aware that it may be polluted.
- Spills of concrete, cement, grout and similar materials will be contained and ensured that they cannot reach surface water or drains.
- Concrete washout from mixing plant will be carried out in a designated contained impermeable area.

CONCRETE PLACEMENT

- We will discuss arrangements for deliveries to site with suppliers before work starts, agreeing routes, designated washout areas and emergency procedures.
- Bulk and bagged cement and concrete additives will be stored at least 10m away from watercourses, gullies and drains.
- A contingency plan will be put in place for uncontrolled releases.

5.7 Control Measures for Oil Storage

Oil is one of the most common pollutants in the UK and spilled oil can pollute waterbodies and groundwater supplies which can be used for drinking water.

TYPES OF OIL EXPECTED TO BE FOUND ON SITE

- Petrol
- Diesel
- Heating oils
- Biofuels
- Lubricating and hydraulic oils
- Synthetic and mineral oils
- Biodegradable
- Shuttering and cutting
- Waste oils

OIL STORAGE LOCATIONS

In all cases we will avoid storing oil in high risk locations such as:

- Where there is risk of damage by impact or collision e.g. from site traffic
- Within 50M of a spring, well or borehole
- Within 10M of a watercourse, ditch or drainage channel
- Where spilled oil could enter open drains or soak into unmade ground where it could pollute groundwater

OIL STORAGE TANKS AND CONTAINMENT SYSTEMS

When storing more than 200litres of oil, a secondary containment system will be provided. The capacity of the secondary containment system will be either 110% of the largest drum or 25% of the total volume stored (whichever is greater). Additionally all ancillary equipment will be kept contained within the bund.

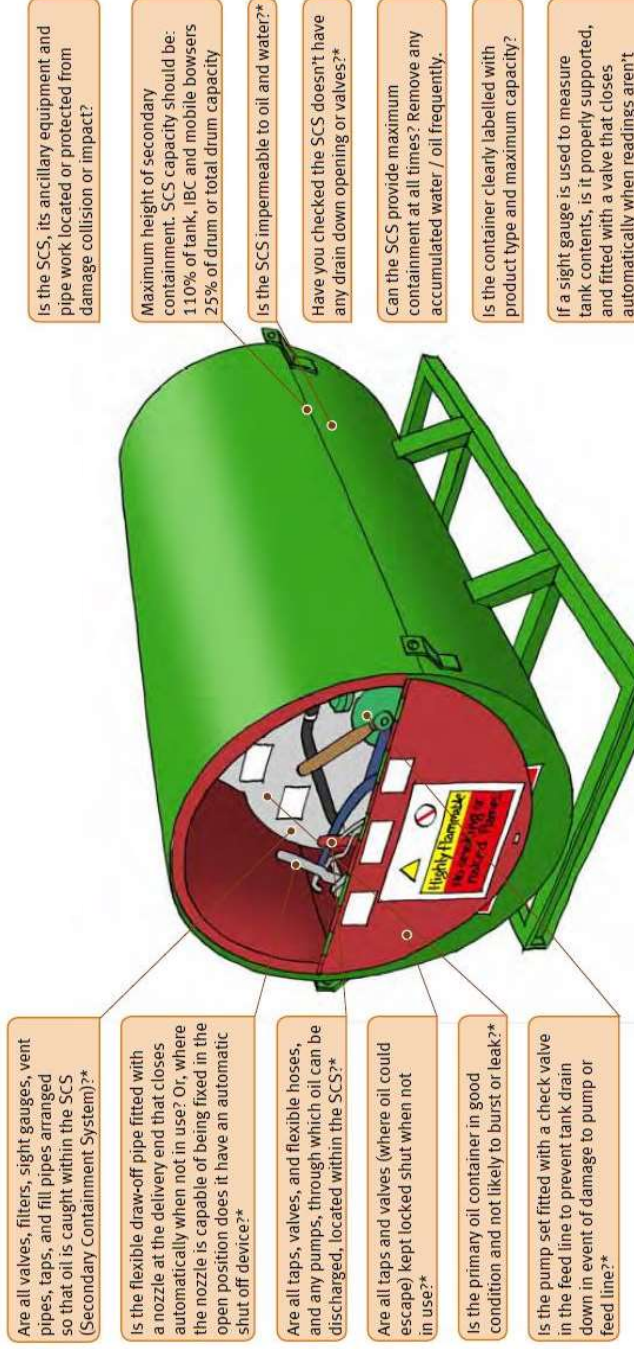


Figure 8 - Illustration of oil storage with a secondary containment system

INSPECTION AND MAINTENANCE

All oil storage areas, containers and secondary containers will be frequently inspected and checked for signs of damage, corrosion, bulging, leaks or unauthorised use and interference. Any required maintenance, defects or faults will be repaired immediately.

5.8 Control Measures for Refuelling

A **designated refuelling** area will be established for the project. This area will consist of an impermeable surface, situated well away from watercourses. Signage (such as that illustrated below) will be erected to indicate the location of the refuelling area and an oil spillage kit will also be at hand at this area. All fuel deliveries to site will be supervised by a designated individual.



Figure 9 - Example of a protected refuelling area on handstand with spill kit

When refuelling has to be carried out away from the designated area, it will be carried out by using a drip tray or other secondary containment solution to prevent oil from spilling onto the ground. Where mobile refuelling is necessary, all bowzers will carry an emergency spill kit. All oil containers (including mobile bowzers) will be returned to the designated storage area after use.

5.9 Appointed Persons for Refuelling

A dedicated person(s) will be appointed and trained for the purpose of refuelling on site. An “appointed persons” poster such as that shown below will be completed and displayed on site.

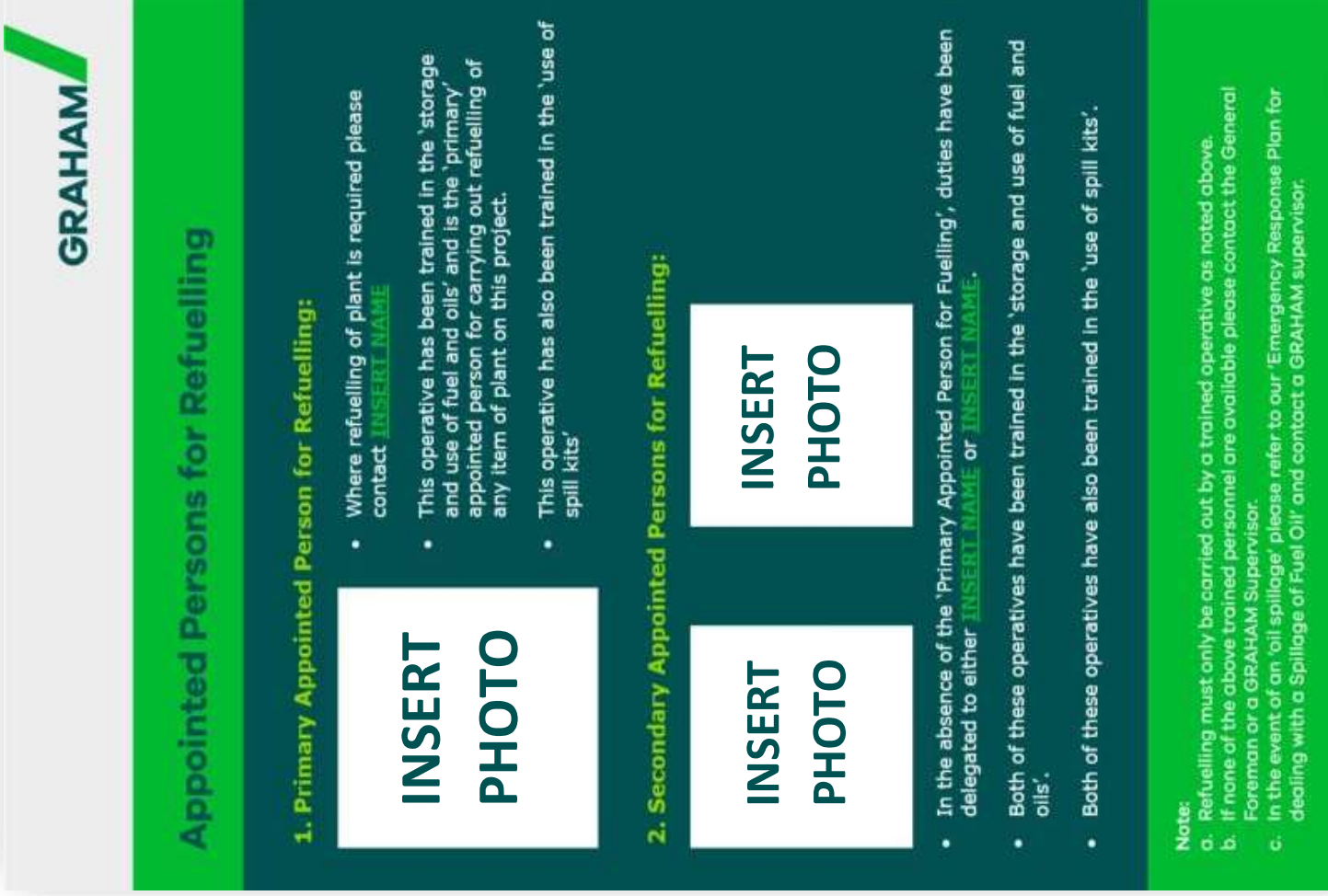


Figure 10 - Poster template (Appointed persons for refuelling)

5.10 Control measures for discharging Water

- We will minimise the amount of wastewater which needs to be discharged and find alternative means of disposal where possible.
- Any temporary stockpiling of materials will be prevented from eroding by rainwater or surface water runoff.
- Water containing silt, or any other contaminating material will not be released directly to a watercourse of surface water drain. Treatment facilities, such as sediment traps will be used as appropriate, before water is discharged. These facilities will be regularly inspected and maintained. A full record will be kept of inspection, maintenance and measures employed to sustain performance.
- All site discharges will be of a quality, by a method and at a location acceptable to the regulator. This will be agreed (via written consent) in advance of works commencing on site.
- Prior to any discharge into a sewer, a Trade Effluent Consent will be obtained from the local Water Company
- A "permit to pump/ discharge" (See Appendix 5.1 - Ref: PF10-PR10-43-F012) will be used to ensure that personnel discharging water are fully aware of the requirements.
- Where applicable, a Water Quality Monitoring Plan will be drawn up prior to construction commencing. This will detail the requirements and frequency of water quality sampling as a result of construction activities and will specify the parameters to be achieved relevant to the water quality objectives at the receiving site.

5.11 Control measures for Abstracting Water from Excavations

- The removal of water from an excavation is a high risk activity.
- Prior to excavation below the water table, including site de-watering, we will inform the regulator and Water Company of the works to be conducted. Any de-watering, groundwater lowering and disposal measures will be agreed in advance with the regulator and if necessary an Abstraction Licence obtained.
- A "permit to pump/ discharge" (See Appendix 5.1- Ref: PF10-PR10-43-F012) will be used for any abstraction activities
- A small sump will be dug in the excavation for the head of the pump. This will be surrounded by a perforate pipe and a suitable grade of clean stone.

5.12 Control measures for Drainage

Drainage systems can act as a pathway to spread pollutants. Drains can also make pollution invisible, so it is important to know where drains are located and where they lead in order to prevent polluting materials entering drains.

- All existing drainage on site (e.g., surface water, foul sewer) will be identified and a "drainage plan" will be made available
- All drain covers and gullies will be clearly marked to identify them (Recommendation is red for foul, blue for surface water)
- If any pollution enters a drain, the site spill response team will immediately stop the pollution with a physical block, stop the activity causing the pollution, then notify the Environmental Manager.

5.13 Control measures for Flood Protection

- A member of the site team will be designated with the responsibility for monitoring weather warnings and flood warnings.
- In the event of a storm being detected (and where it is likely to impact during the construction period), the designated site team member will inform management staff and procedures will be put in place to secure the site and evacuate the area.

5.14 Water Efficiency

A practical system will be put in place to minimise use of mains water during the construction process. Mains water consumption from the site offices and operations will be measured and monitored monthly with action for reduction of consumption implemented.

Water efficiency techniques employed on site will include the following actions (where relevant and feasible):

- Daily Visual Inspection for leaking pipes / taps / valves.
An unfixed leak can be the most significant water use on site. Leaks can come from damaged washers in taps, worn valves and corroded or damaged pipework.
- Fit Trigger Guns to Hoses
Hoses left running when not in use waste a lot of water in a short time. Fit robust trigger guns to hoses so that flow can be controlled at the point of use.
- Closed Loop Wheel Wash
A closed loop wheel wash reuses the water for the process. Waterless systems are another innovative option that use angled steel grids to clean debris from tyres.
- Dust Suppression
Most suppression techniques are very water inefficient. A fan misting system is a mains fed electrically powered efficient alternative
- Washing Out Concrete Wagon Chutes
Mains pressure hoses with basic spray patterns are water inefficient. Use a high pressure low volume efficient spray pattern to reduce water use. Wash out water can be re-used at concrete batching plants
- Commissioning Water Use
High volumes of water are used during building services commissioning and testing. Plan for these activities considering water recirculating and minimisation.
- Rainwater Harvesting
Where possible, rainwater will be harvested from the roofs of the site accommodation, to feed boot wash; or used to fill the water bottle of power saws and other similar power tools for dust suppression.
- Low flush toilets
Utilising a low flush toilet uses significantly less water than a full-flush toilet. Single or dual flush models are available.
- Taps of the aerated mixer type with flow restrictors
Tap aerators are water saving devices that control the amount of water that flows through the tap without affecting the water pressure as they mix the water with air.

SECTION 6.0 Dust and Air Quality Management Plan

Guidance Notes:

This section contains details of the steps required in order to ensure best practice with regard to the protection of air quality and dust prevention

- 6.1 Dust and Air Quality Issues**
- 6.2 Site Conditions**
- 6.3 Monitoring Protocols**
- 6.4 Records of details and action taken in response to exceptional incidents or dust-causing episodes**
- 6.5 Dust and Air Pollution Mitigation Measures**

6.1 Dust and Air Quality Issues

Dust and air pollution, including odours, can cause nuisance affecting properties. In addition, there are statutory objectives in relation to nitrogen dioxide (NO2) and fine particulate matter (PM10) which have known health impacts.

Section 79 of the Environmental Protection Act 1990 defines a number of factors relating to dust and air pollution which constitute a statutory nuisance. This includes:

- Smoke emitted from premises so as to be prejudicial to health or a nuisance
- Fumes or gases emitted from premises so as to be prejudicial to health or a nuisance
- Any dust, steam, smell or other effluvia arising on industrial, trade or business premise and being prejudicial to health or a nuisance
- Any accumulation or deposit which is prejudicial to health or a nuisance

Our objective is to carry out the works in such a way that emissions of dust and other air pollutants including odour are limited and to use best practicable means to avoid the creation of nuisance.

6.2 Site conditions

Summary of work activities that may give rise to dust and air pollution

- Construction plant and vehicles
- Transportation and storage of materials
- Excavations and earthworks
- Operation of the construction site or undertaking construction activities which results in odours being generated from, for example, smoke, fumes or gases

Summary of receptors relevant to the works

- The public and hospital environment adjacent to the construction site
- Site workers
- Watercourses
- Ecological receptors

6.3 Monitoring protocols

The inspection and monitoring procedures to be implemented to monitor the effectiveness of measures to prevent dust and air pollutant emissions and to avoid detrimental effects on the health of workers or nuisance to sensitive receptors due to exposure to dust and air pollution are as follows:

- Daily inspection of areas adjacent to the construction site to monitor any dust and air pollution which may be generated despite the use of best practicable means to prevent dust and air quality emissions.
- Daily inspection of construction vehicles, plant and machinery.
- Daily inspection of the level of trafficking, use and condition of access routes to site.

Should inspections show a nuisance arising, work will be stopped until prevention and remediation measures are implemented.

6.4 Records of details and action taken in response to exceptional incidents or dust-causing episodes

Records will be made within the site diary where action was taken in response to exceptional incidents or dust-causing episodes.

Full details of any complaints in relation to dust will be recorded by the Site Management Team on Cora.

6.5 Dust and Air pollution mitigation measures

GENERAL

- The GRAHAM Site Management Team will use best practicable means to prevent nuisance as a result of dust through design and different work methods
- Site operatives will receive training as part of site induction, toolbox talks and through communication of relevant environmental risk assessments and method statements
- The site will be laid out such that machinery and dust-causing activities will be located away from sensitive receptors, where reasonably practicable
- Hoardings and other barriers will be erected along the site boundary, to mitigate the spread of dust to any sensitive buildings or other environmental receptors

CONSTRUCTION PLANT AND VEHICLES

- Construction plant will be operated in accordance with the manufacturer's written recommendations
- All vehicles and plant will be switched off when not in use – NO IDLING
- Vehicle and construction plant exhausts will be directed away from the ground where possible and be positioned at a height to facilitate appropriate dispersal of exhaust emissions
- Enclosing, shielding or provision of filters on plant likely to generate excessive quantities of dust beyond the site boundaries will be employed
- The movement of construction traffic around the site will be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the Project
- Construction plant will be located away from site boundaries which are close to sensitive receptors where reasonable and practicable
- We will avoid use of diesel or petrol powered generators by using mains electricity or battery powered equipment where reasonable and practicable
- We will keep vehicle, plant and equipment maintenance records on site and these will be made available to the Employer's Representative upon request

TRAFFIC/ ACCESS ROUTES

- On-site parking will be designated for staff and visitors
- Inspection of vehicle movement area site conditions will be undertaken by the Site Manager
- Delivery drivers will be made aware of site restrictions
- Vehicle speeds will be restricted to 10m/h to prevent high levels of dust being released
- Vehicles either delivering or removing material from Site, which have a dust potential, will be covered with tarpaulin or the like to minimise the release of dust

TRAFFIC IMPACTS ON PUBLIC ROADS

- Vehicle wheel washing facilities will be provided and there will be a road sweeper on hand at the site to clear up any material deposited on the public highway by vehicles accessing/egressing the site and site compounds.
- Public roads outside of the site will be regularly inspected for cleanliness and cleaned as necessary
- Site Management will liaise with relevant authorities regarding any road or lane closures
- Delivery drivers to adhere to public road restrictions.
- Neighbours will be advised of unusual traffic movements (e.g. concrete wagons for continuous large concrete pours/ abnormal loads etc.)

SECTION 7.0 Noise and Vibration Management Plan

Guidance Notes:

Details of control measures in respect of noise and vibration are contained within this section.

- 7.1 Noise and Vibration Issues**
- 7.2 Site Conditions**
- 7.3 Noise Control Measures (General)**
- 7.4 Operating Hours**
- 7.5 Establishment of Baseline Conditions**
- 7.6 Noise Monitoring Plan**
- 7.7 Liaison with the Local Community during the Contract**
- 7.8 Establishment of Working Relationship with the Local Authority**
- 7.9 Section 61 of the Control of Pollution Act (COPA), 1974**
- 7.10 Programming of Works**
- 7.11 Distancing from Sensitive Receptors**
- 7.12 Plant and Equipment**
- 7.13 Traffic Noise during Construction**
- 7.14 Noise Screening**
- 7.15 Vibration**

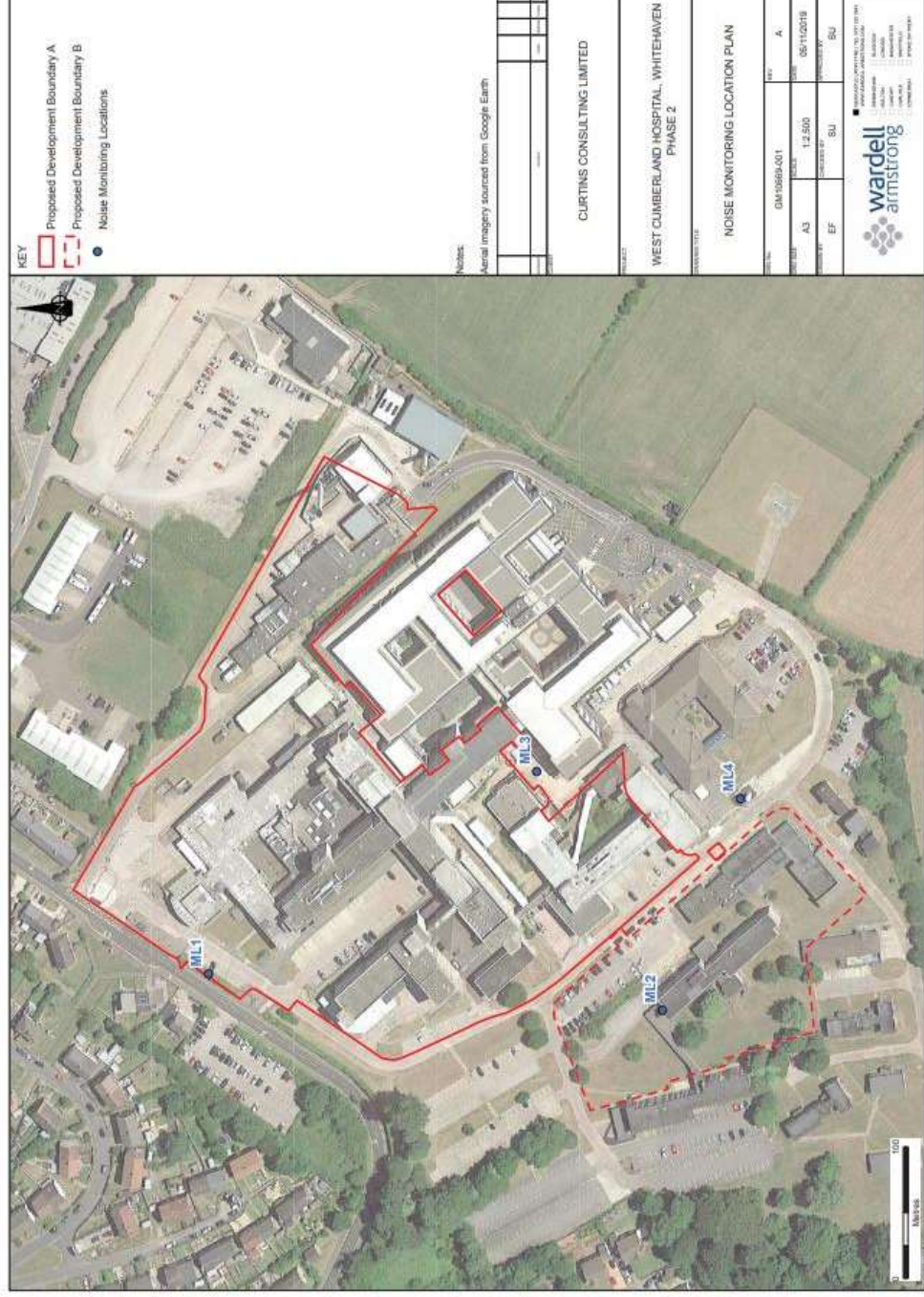
7.1. Noise and Vibration Issues

Excessive noise and vibration on site not only represent a major hazard to site workers but it can also annoy neighbours and in some cases disturb adjacent wildlife. Best practice will therefore be implemented in order to minimise noise and vibration and comply with the contents and recommendations of the "Code of Practice for Noise Control on Construction and Open sites" (BS5228-1: 2009+A1:2014).

7.2. Site Conditions

Details of baseline surveys

- Baseline noise surveys were undertaken on 24th and 25th July 2019.
- The noise monitoring locations are presented below



- During the noise survey, it was observed that the dominant sources of noise originated from an Oxidising Refrigerant Unit (ORU) was noted as the most noticeable existing plant noise which may impact the proposed receptors of the Phase 2 buildings. It is calculated that the ORU would have a low impact on the proposed development and no noise mitigation measures are required.

- The results of the baseline noise measurements are presented below

Table 2: Measured Road Traffic Noise Levels

Noise Monitoring Location	Average Daytime dB $L_{Aeq,16hour}$	Average Night-time dB $L_{Aeq,8hour}$	Highest Night-time dB $L_{Amax,f}$
ML1	64	56	76

Table 3: Measured Representative Background Noise Levels

Noise Monitoring Location	Daytime dB(A) $L_{90,1hour}$	Night-time dB(A) $L_{90,15minute}$
ML2	42	28
ML3	42	35

Details of noise and vibration receptors

- The location of the key noise and vibration sensitive residential receptors are to the southwest a carpark area and residential dwellings.
- To the Northwest the site is bound by Homewood Road, with residential dwellings beyond.

Details of possible noise and vibration impacts and assessment

The Main Noise and Vibration sources relevant to the works are:

- Construction Noise
- Construction Traffic Noise
- Construction Vibration

According to Noise Assessment Report the Noise effects during construction are not considered to be significant

7.3. Noise Control Measures (General)

No part of the works will be carried out in such a manner as to cause unnecessary noise except in cases of an emergency when the work is absolutely necessary for the saving of life or property or the safety of the works.

All operatives will receive training and advice on noise minimisation and general good site practice through site-specific training and briefings.

7.4. Operating Hours

The working hours on this project are restricted to:

07.30-18.00 Mon- Fri and

07.30-17.00 Saturday

Any other hours outside these to be agreed with PM and Trust.

These hours are set out within planning requirements and will be strictly adhered to.

Prior agreement will be sought from both the Local Authority and the client if occasions arise where it is necessary to work beyond these times.

Working hours and contact details will be displayed on external site hoarding using the environmental noise information poster.

7.5 Establishment of baseline conditions

Prior to work commencing the site team will ensure that baseline noise measurements have been taken in order to understand the dominant noise sources and extent in the vicinity of the site area. The location of key noise and vibration sensitive residential receptors will also be identified.

7.6 Noise Monitoring Plan

A Noise Monitoring Plan will be drawn up prior to construction commencing. This will detail the predicted noise levels as a result of construction activities and will specify the typical noise levels of construction plant intended for use. This will be set against appropriate construction noise impact criteria. Anticipated noise monitoring positions will also be set out.

Mitigation measures will be undertaken if the results of noise monitoring indicate that excessive noise impacts are arising from the activities associated with the works.

7.7 Liaison with the Local Community during the Contract

The effect of noise and vibration on nearby sensitive receptors will be minimised through a good communication strategy. Prior to works being undertaken, consultation with occupiers of sensitive receptors that may be adversely affected by construction noise and vibration will be undertaken. We will provide information of construction works and notice of when high noise and/or vibration generating activities are taking place. It is intended that this will increase the tolerance of



Figure 11 - Noise Control Poster

receptors and thus minimising adverse effects. All communications will contain contact details to direct any questions or complaints to.

7.8 Establishment of working relationship with the Local Authority

The site team will make contact with the local authority at the earliest opportunity. Agreement with the local authority will be sought on appropriate controls for undertaking significantly noisy works close to receptors.

7.9 Section 61 of the Control of Pollution Act (COPA), 1974

Consideration will be given to the merit in applying to the local authority for a section 61 prior consent. Section 61 is in effect an agreement between the developer and the local authority which allows a reasonable level of noise to occur. This offers protection from any subsequent action by the local authority under section 60 or 66 of COPA or under the Environmental Protection Act to impose further controls on noise from the site. It also allows the local authority to (a) Attach any conditions (b) Limit or qualify a consent to allow for any change in circumstances (c) Limit the duration of a consent. Any person who knowingly carries out the works, or permits the works to be carried out, in contravention of any conditions attached to the Prior Consent will be guilty of an offence.

7.10 Programming of works

Information will be sought from the community concerning sensitive periods so works can be planned to occur outside these times

7.11 Distancing from Sensitive Receptors

- Noisy work activities will be planned in order to maximise the distance from the noise source to sensitive receptors
- Work compounds will be laid out so that access and loading areas are located as far away from sensitive neighbours as practicably possible
- Shouting and raised voices will be kept to a minimum. The use of tannoy's and radios will be prohibited within close proximity of sensitive residential receptors.

7.12 Plant and Equipment

- Modern installation techniques will be adopted that utilise high frequency pile drivers which significantly limit noise and vibration. Pile dampers will also be utilised.
- Selection of equipment will be carried out with the objective of reducing noise and vibration wherever possible. Only equipment conforming to relevant national or international standards, directives and recommendations on noise and vibration emissions will be used
- Plant and equipment will be maintained and operated following manufacturer's instructions to run efficiently generating minimal noise
- Where possible plant producing less noise will be used
- Pneumatic tools will be fitted with silencers or mufflers
- Plant will be switched off when not in use
- Mobile compressors and generators will be fitted with appropriate silencers and/ or proprietary acoustic enclosures
- Plant and equipment supplied with acoustic enclosures will be operated with all panels closed
- Site staff will enforce a policy whereby all plant is shut down when not in use

- All stationary equipment with significant noise outfall will be sited to minimise noise nuisance to local residents
- As far as possible generation of power will be via a permanent power supply as opposed to generators
- Using electrically powered equipment run from the mains supply where available is preferred to using generators to power plant and equipment
- Care will be taken when erecting or striking scaffolds to avoid impact noise from banging steel. Scaffold deliveries will be programmed to arrive during normal working hours only.
- Crane spindles, pulley wheels, telescopic sections and moving parts of mobile working platforms will be adequately lubricated in order to prevent undue screeching.

7.13 Traffic Noise during Construction

- Delivery vehicles will, where reasonably practicable, be fitted with effective exhaust silencers and will be maintained in good working order and operated in a manner such that noise emissions are controlled and limited as far as reasonably practicable
- Time slots will be adopted for deliveries to ensure that convoys of vehicles do not arrive simultaneously and to avoid unnecessary idling on-site
- Strict controls will be implemented to prevent temporary parking on kerbside in the vicinity of noise sensitive receptors near the site
- Sufficient clear signage will be utilised to ensure that demolition and construction vehicles use only designated routes.
- Care will be taken when unloading vehicles to minimise noise

7.14 Noise screening

Where appropriate, screenings will be utilized in order to reduce noise levels between the source and the receiver. Materials used for screening may include earth bunds, existing buildings, site security hoarding or purpose-built noise screens. Holes/ openings in the screen material will be kept to a strict minimum and the density of the material will also be given due consideration in order to be as effective as possible

7.15 Vibration

A vibration risk assessment will then be undertaken to ensure that underground utilities, buildings and other protected structures surrounding the works are protected from damage.

Controls will be put in place to avoid risk of physical damage from vibration with vibration levels monitored throughout the course of the works. Vibration limits to be agreed with PM / DT.

SECTION 8.0 Energy and Carbon: Management and Reduction Plan

Guidance Notes:

This section contains details of company policy on energy management and how energy efficiency is incorporated within site operations.

- 8.1 Energy & Carbon Issues**
- 8.2 Site Conditions**
- 8.3 Purpose of the Energy and Carbon Management and Reduction Plan**
- 8.4 Climate Action Targets**
- 8.5 Site Energy and Carbon Strategy**
- 8.6 Scope**
- 8.7 Energy Efficiency and Carbon Emission Reduction Activities**
- 8.8 Communication, Campaigning and Training**
- 8.9 Carbon Footprint - Measurement and Reporting**
- 8.10 Carbon Offsetting**

8.1 Energy and Carbon Issues

GRAHAM are at the forefront of action on the climate emergency and to demonstrate our commitment we are signatories to the “pledge to net zero” and the BITC “Climate Action Pledge”. We recognise that climate change is emerging as one of the most serious environmental challenges currently threatening the global community. We understand that there is a need to minimise Greenhouse gas emissions produced as a result of fossil fuel consumption and we acknowledge that we have a role to play in tackling these issues.

8.2 Site Conditions

We are committed to reducing our energy and carbon impacts and we will ensure that the Project adopts a number of low carbon initiatives from procurement of our plant and equipment through to implementing efficient waste management on site and educating our workforce. The SHE Department’s remit will be to evaluate the energy and carbon impact of our activities and to identify solutions aimed at reducing these impacts.

8.3 Purpose of the Energy and Carbon Management and Reduction Plan

This Energy and Carbon Management and Reduction Plan (ECMRP) outlines the GRAHAM targets and strategy for energy and carbon reduction and defines the steps that the Project will take to contribute to these outcomes by specifying key actions. These actions include specific technical interventions leading directly to emissions reduction as well as management, policy and enabling actions. The ECMRP is intended to provide a practical and formal basis for implementing carbon emission reduction throughout the project activities.

The objectives of the ECMRP on a site-specific basis are to:

- Implement practices so that, over the short to medium-term, carbon emissions become one of the issues that are automatically considered in regular decision making across the full scope of site works.
- To undertake a series of interventions that will lead directly to measurable emissions reductions.

Implementing low-carbon initiatives on site is expected to achieve social, economic and environmental benefits.

8.4 Climate Action Targets

The key Climate Action target that GRAHAM have set is as follows:

Carbon emissions to Net zero by 2045 (at the latest) with interim 50% reduction by 2030)

The key GRAHAM Project Specific carbon reduction target 2020/21 is as follows:

Carbon emissions resulting from all project activities must remain below 1.1TCo2e/£1M

The project carbon footprint target aligns with the GRAHAM Company Target to reduce Carbon emissions to Net zero by 2045 (with interim 50% reduction by 2030)

Through implementing the ECMRP on the Project we intend to:

- Reduce carbon emissions
- Improve energy efficiency in work practices
- Reduce water consumption
- Reduce waste, increase recycling and reduce the volume of waste sent to landfill
- Promote and enable environmentally sound transport and travel practices
- Maximise fuel efficiency and minimise as far as practicable carbon emissions from all plant and ancillary equipment
- Run an energy efficiency programme
- Identify opportunities for using energy derived from renewable resources where practicable
- Promote energy awareness amongst staff, encouraging and enabling good environmental practice

8.5 Site Energy and Carbon Strategy

In order to achieve the targets and objectives the following approach will be adopted:

- John Deegan has been named as the individual who will be “Site Environmental Champion” responsible for the monitoring and collection of data
- The Site Environmental Champion will ensure that information regarding the ECMRP, its aims and successes are regularly communicated to all personnel involved in the project
- The Site Environmental Champion will record and display monthly measurements of site energy usage and display graphical analysis of carbon emissions on site noticeboards of how consumption over the project duration compares to the targets
- We will instil the idea that carbon and energy management is the responsibility of every individual and not just that of an interested few
- We will ensure site staff and operatives are fully aware of how to facilitate the success of the plan, as well as to dispel any energy related myths, including through awareness campaigns and competitions

8.6 Scope

The scope of the ECMRP to determine emissions will cover the areas detailed below.

- Utility data covering fuel, electricity and water will be collected for the site compound and all on-site mobile units and recorded on Cora.
- Waste quantities and data will be uploaded to Cora detailing waste streams generated and resultant carbon impacts will be quantified

8.7 Energy Efficiency and Carbon Emission Reduction Activities

8.7.1 Design

- We will work closely with our designers and where appropriate, a whole life Carbon Assessment will be undertaken in order to assist in driving down carbon reductions
- We will prioritise the specification of low carbon or net zero products for use where viable

8.7.2 Low Carbon Plant and Equipment

- Telematics will be utilised in order to monitor the performance of machinery and plant in order to ensure that it is effective and efficient in order to maximise productivity and reduce carbon.
- Due consideration will be given to energy efficiency and emissions when plant and vehicles are researched for potential use on site. We will continue to work with plant manufacturers to ensure that we will be at the forefront of trials on the use of available electric, hybrid and hydrogen plant as the technology begins to mature.
- We will explore the viability of alternative sources of energy including fuel cell modules and HVO biofuels which are compatible with existing diesel engines and equipment
- All Plant and vehicles will be serviced at designated intervals, so they run efficiently, thereby reducing carbon emissions. Where subcontracted or hired plant or vehicles are utilised on our sites, evidence of testing, inspection and regular maintenance will be sought prior to any permitted usage on the site.
- Idling of plant will be minimised

8.7.3 Low Carbon Site Compound

- Welfare accommodation will be required to meet the GRAHAM eco specification standard to include energy saving devices and technologies.
- On site renewable energy solutions for site accommodation will be implemented where feasible.
- GRAHAM have partnered with energy management broker Sustainable Advantage to assist sites in procuring electricity/ gas. By operating through a broker we can ensure that sites/offices utilise green tariffs where all energy is renewable.
- Where feasible we will look to install Electric Vehicle charging infrastructure within site compound areas

8.7.4 Green Transport

We recognise that the travel associated with our business has a direct impact on the environment, particularly through vehicle emissions, fuel consumption and our impact on local congestion. For this reason, we are committed to reducing the need for unnecessary business travel and encouraging the use of more sustainable forms of transport across our operations.

The specific Green travel practices which will be implemented on site are as follows:

- The Carbon Trusts eco driving training will be mandatory training for high mileage drivers.
- Promote the Green travel policy initiatives - Raise awareness on site of the need to reduce transport emissions
- Consider the location of meetings to minimise travel distances and promote the use of video conferencing and tele-conferencing to replace some work trips

- Encourage car sharing and the use of work vans & minibuses to minimise collective distances travelled
- Encourage sub-contractors to use work vans & minibuses to travel to site to minimise collective distances travelled

8.7.5 Managing Behaviours

- Energy awareness will be encouraged amongst employees through energy saving posters and training
- Energy usage will be monitored against agreed targets
- Energy Audits will be regularly conducted by the SHE team, with opportunities for improvement implemented
- Subcontractors and suppliers will be encouraged to adopt energy efficient systems of work in their operations
- All staff and subcontractors will be reminded that appliances must be switched off when not in use

8.8 Communication, Campaigning and Training

In order to ensure the success of the ECMRP it is essential that all relevant parties are kept informed as to how they can assist in reaching the emissions reduction targets as well as communicating success stories on what has already been achieved. The table below outlines the proposed communication strategy.

The objective of the Communication Strategy is to promote energy awareness, to encourage a low carbon culture and to disseminate information on the ECMRP and performance against emission targets.

Method	Description	Target	Involvement
Site Induction	Verbal instruction given at Site Induction	Site Operatives, Site Visitors	Site Manager
Posters, Resource Management Summary, Advice Notes	Printed material for distribution on site and displayed on notice boards in site compound and offices.	Site Operatives, Site Visitors	Site/ Project Manager, Environmental Manager/ Advisor and SHE Team members

8.9 Carbon Footprint - Measurement and Reporting

We have invested in and improved the mechanism for monitoring site energy and carbon in order to streamline and improve the visibility of the information for sites and all other interested parties.

Carbon footprint data will uploaded to Cora on a monthly basis. The software will be used to convert the data into TCO2e by applying an appropriate emission factor as determined by UK Government conversion factors.

8.10 Carbon Offsetting

We have engaged with "Natural Capital Partners" to enable sites the opportunity to offset their emissions and become "carbon neutral"

SECTION 9.0 Site Waste and Resource Management Plan

Guidance Notes:

This section contains details of the processes and opportunities to reduce waste, reuse or recycle products, components and buildings, and for materials to move up the waste hierarchy so that material resources can flow around a circular economy.

- 9.1 Purpose and Description of the Project**
- 9.2 Responsibilities and Declarations**
- 9.3 Description of Waste Management Roles**
- 9.4 Waste Management Policy**
- 9.5 Benchmarks for Conserving Resources**
- 9.6 Proposals for Waste Minimisation**
- 9.7 Identification of Waste and Proposals for Waste Reuse and Recycling**
- 9.8 Organisations which may be used to facilitate reuse**
- 9.9 Waste Storage Arrangements**
- 9.10 Office Waste Arrangements**
- 9.11 Duty of Care and Waste Transfer Procedures**
- 9.12 Waste Transfer Note Detail**
- 9.13 UK SIC CODES - Excerpts from UK Standard Industrial Classification of Economic Activities**
- 9.14 Minimisation of Hazardous Waste**
- 9.15 Typical Hazardous Outputs**
- 9.16 Management of Hazardous Waste**
- 9.17 Hazardous Waste Consignment Note Detail**
- 9.18 Training**
- 9.19 Subcontractor Requirements**
- 9.20 Management of Subcontractors**
- 9.21 Waste Management Supplier Requirements**
- 9.22 Waste Monitoring and Reporting**

9.1 Purpose and Description of the Project

Project Name	West Cumberland Hospital, Whitehaven (Phase 2)		
Project Location	Homewood Road, Whitehaven, Cumbria, CA28 8JG		
Project Cost (estimated)*	£29M		
Project Start Date	Date	Month	Year
	11 th	April	2022
Project End Date	Date	Month	Year
	30 th	March	2024
Description of the Project	<p><u>The project consists of the Phase 2 New Build</u></p> <p>This is the second phase of development of the West Cumberland Hospital. Its aim is to deliver the vision of creating a modern, state of the art 'Full integrated Health Campus' within the region of West Cumbria. In 2015, Phase 1 of the WCH redevelopment was completed at a cost of £110m.</p> <p>The two storey Phase 2 extension will comprise of 4,200sqm of accommodation including a new main entrance, a new retail space and new clinical accommodation for services currently spread over the existing hospital site.</p> <p>In summary, the second phase will comprise of the following:</p> <ul style="list-style-type: none"> • 32 bed In-patient Ward (Step Down & Palliative Care) Level 3 • 14 bed Paediatric Ward. (level 4) • 24 bed In-patient ward (level 4) • Admin and Support Spaces • Ground Floor Retail opportunity • Shared Physiotherapies Suite • A new compliant Changing places toilet 		

Project Footprint (Sq/M)	4,200sqm
Client	North Cumbria Integrated Care NHS Foundation Trust
Principal Contractor	GRAHAM Construction
Version Number and Date	11.2.22

9.2 Responsibilities and Declarations

	Name	Contact details
Who is responsible for drafting the SWMP?	David O'Hagan	David.OHagan@graham.co.uk
Who is responsible for implementing the SWMP on site?	John Deegan	John.Deegan@graham.co.uk
Who is the waste champion?	To be elected from the workforce	To be elected from the workforce
Who is the person in charge of the project?	Damian McCabe	Damian.mccabe@graham.co.uk
Where will this SWMP be kept?	The site office	

Declaration statement:

We the 'Client' and the 'Principal contractor' will take reasonable steps to ensure that all waste from the site is dealt with in accordance with the waste duty of care in section 34 of the Environmental Protection Act 1990 and the Environmental Protection (Duty of Care) Regulations. All reasonable steps will also be taken to ensure that the waste materials are handled efficiently, and waste managed appropriately.

Client signature:

Signature of Principal Contractor Representative:

Signature of S/C Representative(s):

9.3 Description of Waste Management Roles

<p>Project Manager: John Deegan</p>	<ul style="list-style-type: none"> • Ensure plan meets client’s approval and is signed off accordingly • Implementing and managing the plan on site • Arranging for full details of all arising’s, movements and treatment of waste to be accurately recorded and reported in a timely manner • Distinguish reusable materials from materials suitable for recycling • Ensure maximum segregation at the source and separate materials for recovery • Appointment of a suitable “Waste Champion” for the site
<p>Environmental Manager: David O’Hagan</p>	<ul style="list-style-type: none"> • Implementing the plan within GRAHAM • Providing training • Providing advice and guidance to the Site Manager and ensure that best practice is transferred across the organisation • Conducting waste audits
<p>Procurement Manager: Colin Ferguson / Colleen Parke</p>	<ul style="list-style-type: none"> • Ensure that materials are ordered so that the quantity delivered, the timing of the delivery and storage of materials does not generate unnecessary waste • Ensure that the waste management requirements within the GRAHAM procurement documents are communicated to our supply chain • To undertake early engagement with our Waste Management Contractor in order to discuss our waste forecasts and to ensure an optimal skip strategy which maximises recycling
<p>Environmental Champion: To be elected from the workforce</p>	<ul style="list-style-type: none"> • Overseeing management of waste records • Periodic reviews of SWMP • Regular inspection of waste recycling areas on site • Ensuring that regular toolbox talks on waste management and minimisation are carried out • Encourage and motivate site personnel to implement best practices
<p>Appointed Operatives:</p>	<ul style="list-style-type: none"> • Ensure that discrete operations stated in the SWMP are performed on an on-going basis

9.4 Waste Management Policy

GRAHAM operate an Environmental Management System which is certified by National Quality Assurance (NQA) against the requirements of BS EN ISO 14001:2015. Our EMS will be utilised to assist in the employment of waste reduction techniques on the project

This Site Waste Management Plan has been prepared in accordance with the GRAHAM Environmental Policy, Waste Management Policy and Waste Management Procedure **PF10-PR10-44**

GRAHAM are committed to the Circular Economy, where products and materials are kept in high value use for as long as possible. This includes minimising waste, reducing consumption, and designing for reuse, repair and recycling. This commitment has driven the adoption of an approach which prioritises the reuse of all materials and products.

9.5 Benchmarks for Conserving Resources

GRAHAM WASTE TARGETS

	KPI/Metric	Target
A	Tonnes of Construction waste generated per £1M construction value	≤31
B	Diversion of Construction waste from landfill	≥97%

SECONDARY WASTE TARGETS

	KPI/Metric	Target
C	Tonnes of Construction and Demolition waste generated per £1M construction value	≤56
D	Non-hazardous waste relating to on-site construction, refurbishment and fit-out, and dedicated off-site manufacture or fabrication processes generated by the building's design and construction per 100m2 GIFA	≤8.96

- The site construction waste reduction target has been derived using GRAHAM data relating to construction waste generated on all construction sites during our baseline accounting year (2014/15). This waste reduction target aligns with the GRAHAM Company Target to reduce waste generation by 50% by 2030.
- Projects within the building division also benchmark against BREEAM KPIs for construction and waste demolition and waste diversion (Target D)

9.6 Proposals for Waste Minimisation

REF	INFORMATION REQUIRED	YES/NO/NA	RESPONSE / COMMENTS
1.	Have opportunities been identified to reduce waste through the design process e.g., no-dig techniques, pre-fabrication of materials?	Yes	Superstructure being fabricated as precast concrete
2.	Can structures be raised out of the ground to reduce excavation volume?	Yes	Piling being introduced to avoid deep excavations
3.	Is excavation material suitable for re-use following suitable testing?	N/A	TBC- we are currently at RIBA Stage 3 - design
4.	Can excavated materials be re-used at another GRAHAM Site (Note - waste exemption required)	No	No sites with locality.
5.	Can it be arranged for excavated material to be used at a landfill site for capping or engineering works?	N/A	TBC
6.	Can contaminated material be treated using soil washing, bioremediation or other techniques to render it suitable for re-use?	N/A	TBC
7.	Is there scope to use a recycled product such as 6F2 or fine fill aggregates, reducing reliance on finite raw materials?	Yes	Yes – forming for piling mat, backfill under floor slab.
8.	Has the site team discussed and identified strategies for reducing waste with subcontractors?	Yes	Discussed with all sub-contractors at procurement stage.
9.	Has a "Waste Management Suppliers pre-Appointment Assessment" been completed?	No	This will form part of procurement once in contract
10.	Will Subcontractors and Site operatives who handle materials and waste receive waste awareness toolbox talks and other training?	Yes	This talks will form part of overall site induction.
11.	Is waste data going to be regularly reviewed (e.g. during progress meetings) in order to monitor waste targets for the project?	Yes	Information on a monthly basis will be uploaded on Graham system
12.	Will the Environmental Champion be briefed on their duties to help facilitate waste prevention during the project?	Yes	
13.	Can redundant equipment be sold for reuse?	N/A	TBC
14.	Can unsuitable material be conditioned to make it useable by following the relevant Waste and Resources Action Programme (WRAP) quality protocol?	N/A	Dependant on WAC testing currently planned.
15.	Are there any other ways in which the project will minimise waste to landfill?	N/A	Deliveries planned with reduced / zero packaging. Pallets to be reused and recycled, prefabrication where possible.

9.7 Identification of Waste and Proposals for Waste Reuse and Recycling

With reference to the Drawings and Specification, the following materials have been identified as wastes which could potentially arise on the Project.

Quantities of forecast demolition wastes have been derived from a pre-demolition audit which was developed as part of the BREEAM evidence submission for credit WST 01.

Quantities of forecast construction wastes have been derived by multiplying the total material quantity by standard wastage rate data provided by the Waste and Resources Action Programme (WRAP).

Waste Type	Waste Stream	Material Type	Suggested LOW Code	Destination	Forecast Quantities
					(tonnes)
Excavation	Soil and Stones	Soil and stones other than those mentioned in 17 05 03	17 05 04	On-site reuse	TBC
Excavation	Bituminous material	Bituminous mixtures other than those mentioned in 17 03 01	17 03 01	Off-site recycling (segregated)	TBC
Demolition	Gypsum (plasterboard)	Gypsum-based construction materials other than those mentioned in 17 08 01	17 08 02	Off-site recycling (segregated)	10 T
Demolition	Inert	Concrete, bricks, tiles and ceramics	17 01 07	Off-site recycling (segregated)	12 T
Demolition	Wood	Timber materials – demolished roof/doors/window frames	17 02 01	Off-site recycling (segregated)	6 T
Demolition	Metals	Mixed metals – building cladding/pipework/cables	17 04 07	Off-site recycling (segregated)	6 T
Demolition	Insulation	Floor/Wall/Roof Insulation	17 06 04	Off-site recycling (mixed)	3 T
Construction	Gypsum (Plasterboard)	Gypsum-based construction materials other than those mentioned in 17 08 01	17 08 02	Off-site recycling (segregated)	3 T
Construction	Wood	Timber materials – offcuts/shuttering/wooden packaging	17 02 01	Off-site recycling (segregated)	2 T
Construction	Metals	Mixed metals – electrical and plumbing waste/pipe offcuts/stud wall cuttings	17 04 07	Off-site recycling (segregated)	2 T
Construction	Plastics	Hard Plastics/Pipe offcuts/ wrapping protection materials	17 02 03	Off-site recycling (segregated)	2 T
Construction	Packaging	Mixed Packaging – Cardboard/Paper/Plastic	15 01 06	Off-site recycling (mixed)	1 T

Construction	Segregated Hazardous Waste	Used Engine Oil/ Batteries/ Waste paints/ Aerosol cans/ Paint thinners	Various	Off-site recycling (segregated)	0.2 T
Construction	Office waste	Mixed Municipal Waste from site offices/canteen	20 03 01	Off-site recycling (mixed)	2 T

9.8 Organisations which may be used to facilitate reuse

- **The National Community Wood Recycling Project**

www.communitywoodrecycling.org.uk

The National Community Wood Recycling Project (NCWRP) is a network of wood recycling social enterprises. The aim of the enterprise is to

- Save resources by rescuing and re-using waste timber that would otherwise be landfilled
- Create sustainable jobs, as well as training and volunteering opportunities, for local people – especially those who might find it difficult to get into or back to employment.

- **Recipro**

www.recipro-uk.com

Suppliers and contractors donate unwanted, surplus building materials to the Recipro social enterprise. The products are then sold on at hugely discounted rates. Customers range from charities to schools, churches to shops as well as the local community

- **Community Repaint**

www.communityrepaint.org.uk

Community Repaint is a network of paint reuse schemes across England, Scotland, Wales and Northern Ireland. The purpose of the scheme is to collect leftover reusable paint and redistribute it to those who need paint but cannot afford it.

- **International Synergies**

www.international-synergies.com

International Synergies can be utilised to identify any wastes which may have a value to other member companies with a view to third party re-use of these materials.

- **Reuse Network**

www.reuse-network.org.uk

Surplus furniture and household items can be donated for reuse through the Reuse Network. This is a national coordinating body for 300 furniture and appliance re-use and recycling organisations which exist across the UK.

Note - this list is non-exhaustive and may be added to as new opportunities are sought and implemented.

9.9 Waste Storage Arrangements

In line with best practice for the recycling of waste, we will segregate waste on site and to facilitate this, an appropriate number of waste handling and segregation areas will be set up. At these areas, waste streams will be segregated into separate skips and then removed to an approved material recycling facility. Each skip will be clearly labelled indicating type of waste contained within.



Figure 12 - Waste Storage Arrangements

The segregation of skip wastes will be of the following types:

- Metal
- Packaging
- Timber
- Gypsum
- Inert
- Mixed (for all other wastes)

Additional skips and bins will also be provided for office derived waste including:

- Paper & Cardboard
- Plastic
- Cardboard
- Food waste

All skips utilised on site will:

- Prevent spillages or leakages
- Be corrosive resistant (to the weather elements)
- Will prevent scavenging from animals
- Prevent materials from being blown away

9.10 Office Waste Arrangements

Site offices and canteens often generate a significant quantity of wastes, many of which are recyclable. Opportunities should be sought to recycle as many of these items as possible and separate waste bins should be available in the site offices to facilitate collection of recyclables such as paper, cardboard, aluminium cans and plastic bottles. Site Operatives should be regularly reminded of the office/ canteen waste recycling procedures and bins should be labelled to assist in their correct usage.



Figure 13 - Office Waste Segregation

9.11 Duty of Care and Waste Transfer Procedures

Throughout construction of the Project, it will be ensured that all site staff, subcontractors and waste management contractors will act in accordance with all environmental legislation in relation to waste management. All movements of waste will be accompanied by waste transfer notes. GRAHAM site staff will ensure that the waste is described as accurately as possible and that the waste transfer note is signed by both the waste producer and the waste carrier. The waste carrier will hand over a copy of the note to a member of GRAHAM site staff prior to leaving the site.

- Waste Transfer Notes will be stored in [Appendix 4.1 of this plan](#)
- A log of each waste movement will be completed. This can be done via [Cora](#) or by using the [GRAHAM waste log \(REF:PF10-PR10-44-F009\)](#) and storing the log in [appendix 4.4 of this plan](#)

Only registered carriers of waste will be employed for transport purposes and copies of all waste management permits, licences and exemptions will also be obtained and held on site prior to any movement of waste taking place. For all waste transfers, GRAHAM will obtain a copy of the receipt, or a copy of the invoice, from the authorised disposal site as proof that the waste reached the proposed destination.

- Details of Waste Management Carriers for Transporting Waste (REF:PF10-PR10-44-F012) will be stored in [Appendix 4.3 of this plan](#)
- Details of Permitted, Licensed or Exempt Sites (REF:PF10-PR10-44-F011) will be stored in [Appendix 4.2 of this plan](#)

GRAHAM will retain all controlled waste transfer notes for a minimum of two years and hazardous waste transfer notes for a minimum of three years. Waste transfer notes will initially be retained on site and upon project completion will be transferred to a document store in head office. Each consignment of waste taken from the site will be subject to documentation, which will conform to the table below to ensure full traceability of the material to its final destination.

Waste Transfer Note Detail

1. State the name of the waste producer.
2. Signature of the waste producer.
3. Signature of the waste carrier.
4. A combination of:
 - (i) a description of the waste (inert, non-hazardous or hazardous) and
 - (ii) the relevant the European Waste Catalogue (EWC) code classification.
5. State the quantity of waste in cubic metres (m³).
6. How the waste is stored and any processes the waste has been through
7. State the name of the site where the waste is being created.
8. State the date and time that the waste was taken off site by the waste carrier.
9. State the name and address of the waste carrier.
10. Waste carrier licence number
11. State the name and address of where the waste is being taken to and the site licence/ permit or exemption number
12. State whether the waste carrier is the producer or carrier of the waste (in most cases it will be the latter).
13. Highlight on the waste transfer note the certificate number
14. Standard Industry code (SIC) of your business
15. Include a statement that you have applied the waste hierarchy

9.12 Waste Transfer Note Detail

Written Description of the Waste e.g. concrete, timber, mixed construction	Details of the container and the quantity of waste Skip, size, Volume or weight and whether waste is in bags, drums etc
European Waste Code (EWC) E.G. 17 09 04 Mixed Construction	The Waste Hierarchy Declaration confirming that the waste producer has considered prevention, reuse, recycle, recover and disposal in that order.
The Standard Industry Classification (SIC) Code See list of common GRAHAM SIC Codes (section 9.13 of SWRMP)	Details of the person transferring the waste (transferor) this is usually the waste producer – GRAHAM. If subcontractors are arranging waste disposal it may be named.
Details of the place where the waste is transferred from the transferor (waste producer) to the transferee (carrier) this is the location the waste is being collected from	Details of the person the waste is being transferred to (the transferee) this is the waste carrier e.g. skip company, haulage contractor, road sweeper.
Date of the waste transfer (date or period the collection was made)	
The Waste Carriers Registration Number	

Duty of Care – Waste Transfer Note

PF10-PR10-44-F008

Project:

Section A – Description of Waste

- Description of the waste being transferred: _____
- European Waste Catalogue/ List of Waste Code [] [] [] e.g. 17 01 01
- How is the waste contained? Loose Sacks Skip Drum Other Please describe _____
- How much waste? For example, number of sacks, weight etc. _____

Section B – Current holder of the waste (Transferor)

By signing in section D below I confirm that I have fulfilled my duty to apply the waste hierarchy

- Full Name: Graham Construction
- Company name and address: Ballygowan Road, Hillsborough, BT26 6HX
- SIC code (2007): _____
- Which of the following are you: (Please tick one or more boxes)

<input type="checkbox"/> Producer of the Waste	<input type="checkbox"/> Importer of the Waste	<input type="checkbox"/> Registered Waste Carrier
--	--	---
- Please state how has the waste been treated: _____
- Segregation/ separate collection/ screening/ hand picking (Delete as appropriate)
- If treatment has not been carried out please state why this is not considered necessary. (E.g. The waste is inert waste which cannot be treated because it is not technically feasible to do so): _____

Section C – Person collecting the waste (Transferee)

- Full Name: _____
- Company name and address: _____
- Which of the following are you?

<input type="checkbox"/> Holder of a valid exemption	<input type="checkbox"/> Tick Licence/ permit number	<input type="checkbox"/> Expiry date
<input type="checkbox"/> A registered waste carrier/ broker/ dealer	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A

Section D – The Transfer

- Address of transfer/collection point (S/E): _____
- Date of transfer: _____
- Time(s) of transfer: _____
(For multiple consignments/ Season Tickets give "between" dates)
- Destination of Waste, give address: _____
- Destination of Waste, give licence/ permit number: _____
- Name and address of broker who arranged this waste transfer (if applicable): _____

Transferor's signature _____ Print Name: _____ Representing: _____	Transferee's signature _____ Print Name: _____ Representing: _____
--	--

Destination details including permit or exemption reference for that facility GRAHAM requirement for waste destination to be on the waste transfer note

Signatures of the transferee (waste producer) and the transferor (waste Carrier) both signatures are needed on all WTN

Note: Legible copies of waste transfer notes must be available at all times and must be kept for two years from the date of the waste collection



9.13 UK SIC CODES - Excerpts from UK Standard Industrial Classification of Economic Activities

Section F Construction

41100	Development of building projects
Common SIC CODES for GRAHAM operations	
41201	Construction of commercial buildings
41202	Construction of domestic buildings
42110	Construction of roads and motorways
42120	Construction of railways and underground railways
42130	Construction of bridges and tunnels
42210	Construction of utility projects for fluids
42220	Construction of utility projects for electricity and telecommunications
42910	Construction of water projects
42990	Construction of other civil engineering projects
43110	Demolition
43120	Site preparation
43130	Test drilling and boring
43210	Electrical installation
43220	Plumbing, heat and air-conditioning installation
43290	Other construction installation
43310	Plastering
43320	Joinery installation
43330	Floor and wall covering
43341	Painting
43342	Glazing
43390	Other building completion and finishing
43910	Roofing activities
43991	Scaffold erection
43999	Other specialised construction activities

Short Enforcement Guide

- You will be committing an offence, if you give waste to an unregistered waste carrier
- You will be committing an offence, if you do not have valid waste transfer notes and or consignment notes for the movement of waste
- You will be committing an offence, if you transport waste and you are not registered to do so
- You will be committing an offence, if you transport waste and do not have a complete waste transfer note with you
- You will be committing an offence, if you accept waste without holding the relevant waste authorisation
- You will be committing an offence, if you keep, treat or dispose of waste without the relevant waste authorisation

9.14 Minimisation of Hazardous Waste Hazardous Waste Minimisation

Eliminating the use of hazardous materials will eliminate the generation of hazardous waste from these products. Therefore, it is important that designers and architects are involved in any plan to reduce hazardous waste as they may specify materials which we (as a contractor) are bound by. However, GRAHAM also have an element of choice in the products we purchase, and we also have further opportunities to reduce the amount of hazardous waste produced through better handling, segregation and identification of re-use and recycling options.

The following table is a list of potential opportunities that may be applied to the construction project in order to reduce the generation

Hazardous waste management/ minimisation measures

<i>Material</i>	<i>Measure</i>	<i>Indicative Cost</i>	<i>Anticipated Benefits</i>
1. Solvents	Purchase only low-VOC paints, solvents and adhesives	Low	Reduced VOC emissions to atmospheres, less residual solvent in containers, easier disposal
2. Various	Brief all site workers on likely hazardous wastes. Identify and clearly mark recovery & disposal storage arrangements	Low	Less cross-contamination, increased hazardous waste segregation, raised levels of awareness, reduced disposal costs
3. Paints & Solvent	Increase level of accountability for hazardous materials – single point of issue, with nominated person responsible	Low	Less hazardous raw materials used, greater accountability and control/understanding of material usage (benchmarking).
4. Packaging	Clean and sort packaging to reduce hazardous component prior to disposal	Low - Medium	Reduced volume of packaging being consigned as hazardous (disposal costs reduced)
5. Treated wood	Reduce disposal of treated waste wood to landfill – minimise off-cuts and increase re-use where applicable.	Low - Medium	Increased level of beneficial wood re-use (or energy recovery), reduced landfill, potential future revenue source
6. Oils, fuels & lubricants	Ensure all materials are stored in banded areas and allocate central accountability for oil wastes	Low - Medium	Reduce the frequency of spills to ground, increase collection of waste oils/rags.

9.15 Typical Hazardous Outputs

Storage of Hazardous Wastes

All Hazardous waste streams will be stored separately from other Hazardous wastes and will be stored separately from controlled waste in secure and labelled containers.

Typical Hazardous Waste Streams

Typical hazardous waste streams occurring on site will include

Activities	Hazardous Inputs	Hazardous Outputs
Site clearance and demolition	N/A	Asbestos, treated wood, electrical and electronic items containing hazardous components (including cables and switches); refrigerants and foams; drums of hazardous materials, potentially fly-tipped hazardous materials
Excavation	N/A	Potentially contaminated soils, asphalt containing tar products from paving and driveways
General construction works (including cementing, grouting etc.)	Grout, cement, resins, hardeners, various COSHH materials	Spent resins and hardeners, concrete and grout wash-out, un-set cement/grout, contaminated shuttering, spent COSHH materials and contaminated packaging
Building installation (e.g. electrical wiring and fittings, insulation, plumbing)	Fluorescent tubes/bulbs, electrical and electronic equipment and cabling	Spent fluorescent tubes and bulbs, off-cuts of electrical wiring etc.
Floor and wall covering (including plastering)	Adhesives, solvents, coatings, polishes, varnishes, resins, treated wood, plasterboard	Spent coatings and adhesives, empty containers containing residue, contaminated packaging, spent solvents, asbestos, plasterboard off-cuts, plaster washout
Painting (including paint preparation)	Solvent-based paints, paint thinners, enamels, lacquers, epoxies, primers, acrylics, brush cleaners	Spent solvent-based paints, empty solvent-based paint tins containing residue, spent solvent cleaners
Asphalting (roofing, paving)	Asphalt	Unused asphalt containing tar products, contaminated containers and equipment
General maintenance and power generation	Oils, greases, degreasers, batteries	Oily rags, oil filters etc. from maintenance of plant and machinery; waste oil; spent batteries; greases and lubricants; spent COSHH materials; oil contaminated absorbent spill material; contaminated PPE; oil contaminated water from bunds etc.

9.16 Management of Hazardous Waste

How to determine if waste is Hazardous

To determine whether waste is hazardous or not, the European List of Wastes (LoW) should be consulted. Within the LoW, Hazardous Waste is classified as "Absolute, Mirror or Non-Hazardous". Absolute (A*) is considered hazardous irrespective of the concentration of levels of dangerous substances present. A Mirror entry (*) can be either hazardous or not, depending on whether it contains certain levels of "*dangerous substances*".

Unexpected discovery of Hazardous Waste

Unexpected hazardous waste not previously anticipated will be identified as early as possible into the duration of the project. Appropriate facilities and remediation or disposal arrangements will be made at the earliest possible opportunity. Examples of unexpected hazardous wastes include discovery of contaminated land.

Moving and Transporting Hazardous Waste

Hazardous wastes must be:

- Transported by a registered or exempt waste carrier
- Accompanied by a consignment note
- Transferred to a facility that holds a suitable environmental permit or pollution prevention and control (PPC) permit

Consignment Notes

A consignment note should be completed every time hazardous waste is removed from the site. The consignment note will then accompany the hazardous waste whilst it is being moved or transferred. In line with our legal requirements copies of completed hazardous waste consignment notes should be kept for three years.

Consignment notes can be purchased/ obtained from the relevant statutory authority. The type of consignment note you need to complete depends on how and where the waste is transported. You can use single or multiple collection forms.

Pre-notification/ Premise Registration

ENGLAND

A Consignment Note must accompany all movements of hazardous waste. The CN contains more information than a standard Waste Transfer Note and should be retained for 3 years. There is no requirement to pre-notify the regulator of such waste movements.



9.18 Training

Everyone on site will receive training which will include the following waste and environmental issues:

- The Site Waste and Resource Management Plan
- Roles and responsibilities
- Waste procedures on site – including segregation, recycling, reuse and return methods
- Hazardous waste
- Duty of care/ responsibilities
- Materials storage and handling

Waste and environmental training on site will consist of:

- Induction training will incorporate a section on waste management on site
- Toolbox talks will be carried out on waste issues and all site operatives and subcontractors will be expected to attend
- Various employees attend workshops and seminars delivered by External providers such as WRAP in order to further advance knowledge and best practice in relation to waste issues.
- A training course for the elected “Site Environmental Champion” is delivered in house to relevant operatives by the Environmental Manager.

Communication:

- Communication of the progress of the SWRMP is carried out during monthly progress meetings involving site staff, senior management, and the client
- Posters are displayed throughout the site to ensure that everyone is aware of the importance of the Site Waste and Resource Management Plan and adheres to the site waste management procedures

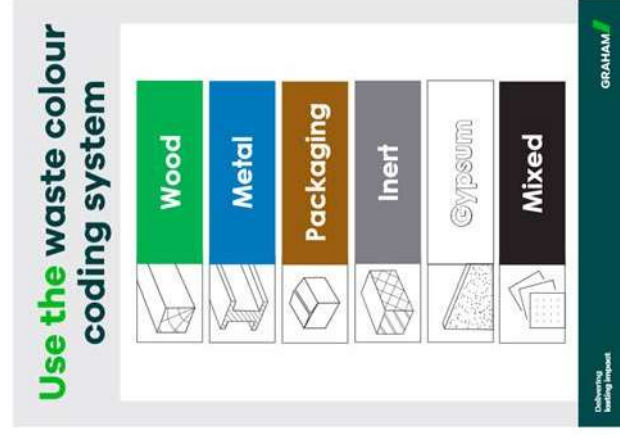


Figure 14 - Posters

9.19 Subcontractor Requirements

All Subcontractors are required to fulfil the following responsibilities in relation to waste management:

- Provide to the project team a forecast of the key waste streams that you will create and an identification of what actions you plan to take to reduce waste.
- Minimise the use of materials and the production of waste through, efficient design, handling, transportation, stock control, the use of prefabricated / pre-sized materials, minimise packaging and efficient construction techniques.
- Segregate waste, use specific waste containers and waste management areas.
- Fulfil all statutory waste handling requirements such as Duty of Care Regulations
- Manage the collection, storage, segregation and treatment/disposal of the different types of waste you produce

In addition, a small number of subcontract work packages may be **responsible for the disposal of their own waste**. Where this is the case, the Site Team will ensure that these Subcontractors undertake the following responsibilities:

- Complete the "Expectations for removal of Excavated Material from Site by a Sub-Contractor" form (**REF: PF10-PR10-44-F007**)
- Provide the waste carriers licence (collection permit in ROI) for the haulier removing the waste
- Provide the waste management licence /permit/ exemption certificate or permit for the site receiving the waste
- Provide any other relevant licence / permit / exemption such as that required for reprocessing or waste storage
- Provide a monthly report (using the standard GRAHAM format) with the quantities of the different types of waste removed from site. This must be provided with the split of each different type of waste managed, according to waste management method – re-use, recycling, recovery, landfill and other, and, in the case of re-use, recycling and recovery, whether this has taken place on- or off-site; and the quantity of waste materials sent to landfill.

9.20 Management of Subcontractors

Illustration of Type A and Type B Subcontractors

The nature of Subcontractor work activities will assist in determining whether a Subcontractor should be responsible for their own wastes (as illustrated below). This arrangement can only be finalised following receipt of relevant documentation illustrated below. Where relevant documentation has not been provided, GRAHAM will arrange the waste removal and contra-charge the Subcontractor as appropriate.

Site Activity/ Sub-contractor Work Package	Primary Waste Stream	Waste Management Responsibility
Demolition and site clearance	Hardcore, spoil, timber, plastics	<p>Type A Subcontractor Subcontractor has full responsibility for their own waste and must collect, store, segregate and dispose of all waste materials in accordance with industry best practice and current legislation.</p> <p>MUST provide the Site Team with copies of the following for all waste leaving the site:</p> <ul style="list-style-type: none"> • Waste Carriers Licences • Waste Management Licences/ permits • Waste Exemption Certificates • Waste Transfer Notes • Hazardous/ Special Waste Consignment Notes • Monthly figures of all waste removed from site to include type of material, total quantity of waste, waste management option i.e. landfill, reuse, recycling and the percentage of each waste material recycled or reused.
Groundworks	Spoil	
Foundations/piling	Spoil and hardcore	
Structure	Bulk concrete, miscellaneous hardcore & metal	
Drylining	Plasterboard, metal studwork and insulation off cuts	
Brick/ blockwork	Bricks (crushed and incorporated into works)	
Building envelope	Timber, plastic, cardboard, hardcore/ rubble, Metal, Hazardous Waste	<p>Type B Subcontractor Waste Management Contractor has responsibility for overall waste management and removal of waste from site.</p> <p>Individual subcontractors have local responsibility for segregation and distribution of waste on site to the waste compound.</p>
Mechanical & Electrical	Cables, metal, timber, plastic, cardboard, plastic packaging, Hazardous waste	
Trades (Joinery, Painting, Timber, cardboard, plastic packaging, Plastering, etc.)	Timber, paint, renders, cardboard, plastic packaging, Hazardous waste	
Landscaping habitat restoration/creation	Green waste and Topsoil	
Site re-instatement, removal of site offices and final clear away	Timber, hardcore, metal, office waste	
Office activities	Paper, cardboard, plastic packaging, general office waste	

9.21 Waste Management Supplier Requirements

To actively help achieve the waste reduction, reuse and recycling targets that have been set out for the project, requirements for Waste Management Suppliers are as follows:

- Agreement to work in accordance with GRAHAM Waste Supplier KPIs
- Fulfil all statutory waste handling requirements.
- Work with the project team to plan and implement suitable on-site waste management processes
- Monthly waste analysis reports to be made available to the GRAHAM site team by the 3rd of each month
- The tonnage of each waste material must be recorded within the waste report and the percentage recovery rates for each material illustrated.
- Waste log to be made available to the GRAHAM site team by the 3rd of each month
- Facilitate site visits/ audits by GRAHAM where requested
- GRAHAM are to be informed immediately of any changes to the operator's conditions, licence suspensions or pending prosecutions
- Delivery of at least 99% diversion of non-hazardous waste from landfill
- Contribute to the development and implementation of the Site Waste and Resource Management Plan as required.

GRAHAM Approved/ Preferred List of Waste Management Suppliers

The GRAHAM SHE team maintain a list of approved/ preferred Waste Management Contractors. Suppliers not on the "approved/ preferred and unapproved list" will be asked to complete the "Waste Management Supplier Pre-Appointment Assessment" ([Appendix 1.3](#) – [REF: PF10-PR10-44-F0010](#)). The returned information will be forwarded to the SHE Team to review details and ensure that the supplier meets relevant GRAHAM environmental requirements.

Reporting and Documentation

The Waste Management Contractor shall provide the following information:

- Waste Transfer Notes and Hazardous Waste Consignment Notes.
- Copies of the Carriers Licence for all carriers used.
- Copies of the Waste Management Licences / Permits (or exemptions) for all destinations of waste.
- A register of containers logged.

On a monthly basis the Waste Management Contractor will supply the following information:

- The quantity (weight) of waste produced for each waste type together with the destination of that waste (reused, recycled, land filled, etc.).
- Recommendations for improved waste management/minimisation.

9.22 Waste Monitoring and Reporting

Waste quantities and data should be recorded within the waste management section of Cora. Data should be uploaded each month by the 5th of the month.



Navigating to Waste Management



Figure 15 - Cora (waste section)

Use Cora to input project waste data. The software will automatically calculate the total waste and waste to landfill

Overview Page - Key Features

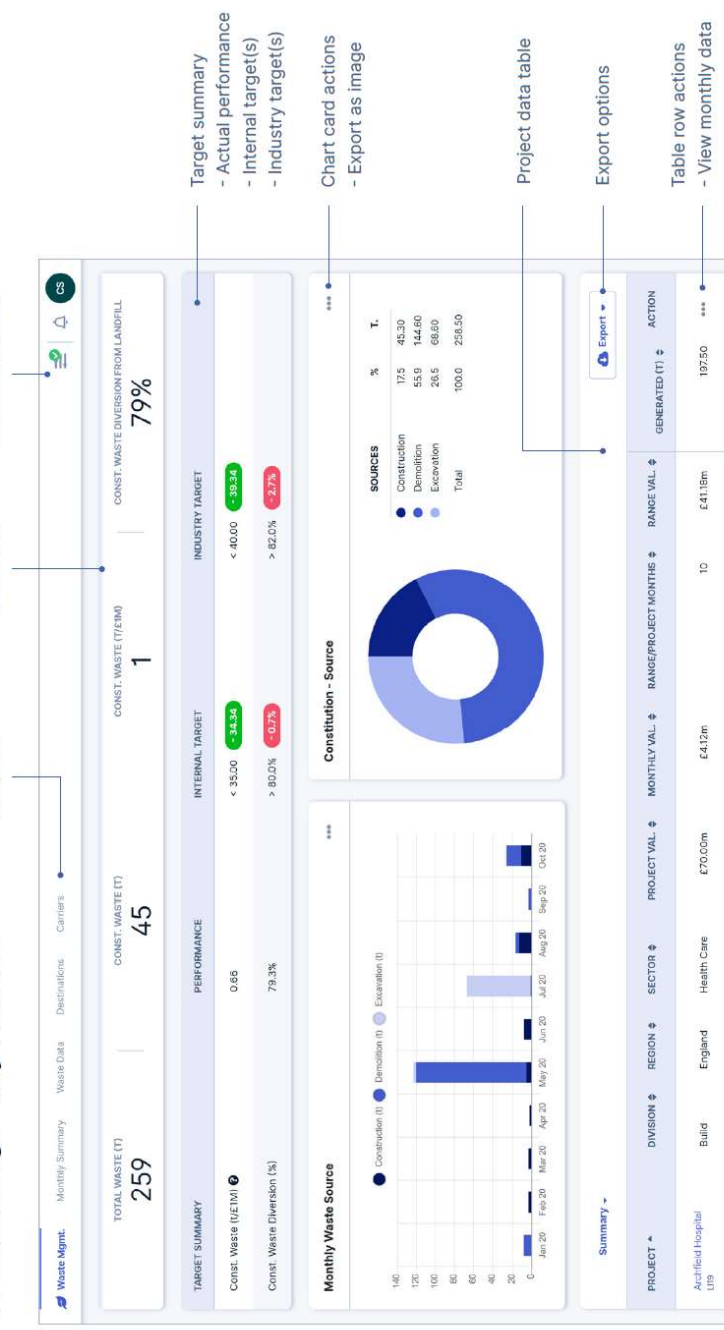


Figure 16 - Cora (overview)

Waste Record – Key Features

The screenshot shows a 'Waste Record' form with the following fields and values:

- Classification:** Non-Hazardous (with a red asterisk indicating it is required).
- Source:** Construction (with sub-options for Demolition and Excavation).
- Material:** 15 01 02 - plastic packaging.
- Quantity Generated (t):** 1.
- Recovery rate (%):** 80.
- Recovered (t):** 0.80.
- Date From:** 04/01/21.
- Date To:** 04/01/21.
- Destination:** Direct recycle off site.

Quantity of Waste

Using the Waste Generated and the Recovery Rate, Cora will calculate the Recovered Waste.

Waste details

Required fields are indicated with a red asterisk *

The date range allows for season ticket movements of the same material, via the same carrier to the same destination.

Carriers & Sites from the Cora directory

Area to attach files

The screenshot shows the 'Waste Carrier' and 'Receiving Site' sections of the form:

- Waste Carrier:** Carrier: 24/7 Waste Carriers; License expiry date: 21/07/25.
- Registration number:** 4567FCHUS.
- Receiving Site:** Site: Blue Sky Recycling Centre; Permit/Exemption number: XPT54HG1; Have checks been carried out on the site?: Yes.
- WTN / Consignment Note:** WTN/Consignment Note Ref; WTN/consignment note / season ticket.

Figure 17 - Cora (Waste Records)

Waste Types Included in the Measurement

- Record ALL construction, demolition and excavation wastes – including that generated by subcontractors (where this is part of the main contact of works)
- Record wastes in Tonnes only. Volumes of waste should be converted using standardised conversion factors
- For skip wastes – find out from your waste management contractor, the total tonnage of waste generated and the percentage that has been recycled and record this within the spreadsheet
- Record ALL reuse of wastes on site e.g. reuse of topsoil in landscaping

Note:

- Guidance from the Department of Communities and Local Government identified that List of Waste **17 05 04 (soil and stones not containing dangerous substances)** is non-exempt and when sent to landfill should be allocated a 50% recovery rate. All sites should therefore ensure that where excavation waste classified under European Waste Code 17 05 04 is taken to landfill, that it is allocated a 50% recovery rate.
- Where EWC 17 05 04 is “beneficially reused” e.g. used as capping as part of a landfill closure or restoration or sent to an “exempt” site, it should be allocated a 100% recovery rate.

SECTION 10 Invasive Species

Guidance Notes:

This section contains details of the steps required to safeguard the site from negative impacts in respect of contaminated land and invasive plants.

- 10.1 Invasive Species Issues**
- 10.2 Identification**
- 10.3 Site Conditions**
- 10.4 Invasive Species Management**
- 10.5 Invasive Species Control and Eradication**

10.1 Invasive Species Issues

Non-native, or invasive, species are described as 'organisms introduced by man into places outside of their natural range of distribution, where they become established and disperse, generating a negative impact on the local ecosystem and species' (International Union for Conservation of Nature (IUCN), 2011). The ecological impacts of such 'biological invasions' are considered to be the second largest threat to biodiversity worldwide, after habitat loss and destruction.

The UK is bound by international agreements such as the Convention on Biological Diversity, the United Nations Convention on the Law of the Sea, the Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979), the Convention on the Conservation of European Wildlife and Natural Habitat (Bern, 1979) and the Habitats and Birds Directives. All of these include provisions requiring measures to prevent the introduction of, or control of, non-native species, especially those that threaten native or protected species (JNCC, 2004). Additionally, Section 14 of the Wildlife and Countryside Act (WCA) (1981) makes it illegal to release, or allow to escape into the wild, certain plants or animals which may cause ecological, environmental or socio-economic harm. These commitments are expected to be subject to greater international enforcement over time.

Those invasive plant species most commonly found in the UK are:

- Himalayan Balsam
- Japanese Knotweed
- Common Ragwort
- Giant Hogweed

10.2 Identification and Survey
















































Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Himalayan Balsam												
Japanese Knotweed												
Ragwort												
Giant Hog Weed												

Figure 18 - Invasive Plant Identification

Where pre-construction information and investigations indicate a potential for the presence of invasive plant species, a survey will be carried out by a competent person and a distribution map drawn up to indicate specific locations of the plant on site.

Where survey information identifies that invasive plants are present on site, an Invasive Plant management plan/ method statement to outline controls must be put in place.

10.3 Site Conditions

No invasive species noted on the project

10.4 Invasive Species Management

- An invasive plant management plan/ method statement to outline controls will be put in place.
- The plant and the surrounding area will be fenced off. The fence will be at least 4 metres away from the outer perimeter of the plant
- Signage will be installed at the area – e.g., Environmentally sensitive area – Keep Out
- Information and basic requirements with regards to the invasive plant will be identified as part of the induction training so that everyone is aware of the requirements
- The control and management of the invasive weed will be regularly monitored for any spread, regrowth or reintroduction. The “Invasive Plants – Record of Monitoring” form and the “Invasive Plants – Record of Treatment” will be completed as required
- If plant and machinery are working in a contaminated area, wheels will be washed on exit
- Double handling of the contaminated materials will be avoided to reduce the risk of spreading the plant

10.5 Invasive Species Control and Eradication

Currently there are various means by which invasive plants can be eradicated from sites. These include:

- Long-term treatment with herbicides.
- Excavation and disposal at a licensed landfill site. (If invasive plants are disposed of offsite, they will be dealt with as waste in accordance with the Duty of Care Requirements)
- Excavation, deep burial and/or bunding on site prior to treatment with herbicide.

Due to site specific variations in soil type, topography, adjacent sensitivities and degree of invasive weed infestations, combinations of various control methods may be used. These methods will be detailed within the invasive plant management plan/ method statement

SECTION 11 Archaeology & Cultural Heritage

Guidance Notes:

This section contains details of archaeological considerations and steps required to safeguard archaeology and cultural heritage during construction.

11.1 Archaeological Monitoring

11.2 Discovery of Unexpected Archaeological Finds

11.1.1 Archaeological Monitoring

Access will be afforded to the site at all reasonable times to any nominated Archaeologist to observe the operations and to monitor the implementation of archaeological requirements.

11.2 Discovery of Unexpected Archaeological Finds

- STOP work immediately.
- IMMEDIATELY PROTECT the find by fencing/blocking off.
- NOTIFY the discovery to the project team
- Access to the area by machinery and personnel is to be prevented.
- Time is to be allowed for the archaeologist to undertake the appropriate level of recording.
- Archaeological objects and treasure discovered must be reported to the regulator

SECTION 12 Emergency Response

Guidance Notes:

This section contains details of the procedure to follow in the event of an environmental complaint, spill or incident.

- 12.1 **Emergency Response Equipment and Resources**
- 12.2 **Environmental Incident Response Plan**
- 12.3 **Emergency Response Reporting**

12.1 Emergency Response Equipment and Resources

Oil spillage kits will be available on site at all times and a team of operatives will be trained on how to maintain, position and use them properly. Training may be carried out in-house by the Environmental Manager or by the site team.

The trained Emergency Spill Response team will be identified on the site's environmental noticeboard.



Figure 19 - Spill kits



Figure 20 - Spill Response Team Poster

Spill kits should be appropriate and adequate for risk on site

If the nature of the incident necessitates external spill response provision, the Emergency Response Team will be contacted using the contact details below:



Response Team	Phone	Availability
OHES Environmental	0333 3331123	24hr Service

12.2 Environmental Incident Response Plan

The Environmental Incident Response Plan describes the actions to take in order to deal with any unexpected environmental incidents and details simple guidance on the immediate action to be taken in order to prevent and minimise pollution resulting from an environmental incident. The response actions are detailed according to the specific pollutant and the receiving receptor.

The Environmental Incident Response Plan also describes environmental incident reporting and investigation processes.

The Environmental Incident Response Plan will be displayed on site and communicated to all operatives. (IMS Ref: PF10-PR10-43-F013)

12.3 Incident response reporting

- All operatives will be made aware that any environmental incident, spillage or compliant must be reported to the GRAHAM site staff as soon as it happens
- Environmental Events as a result of the Works will be recorded by adding an “Environmental Incident”, “Environmental Complaint” or “Other” event record on Cora.
- Every effort will be made to establish the cause of the issue leading to a complaint/ spill/ incident. Assuming the issue arose from the failure of a control system, the issue will be put right at the earliest opportunity
- The response action will be recorded on Cora by the Site Manager
- A log of all complaints/ spills/ incidents and follow-up actions will be maintained
- The Environmental Manager will undertake an investigation of all major incidents and will notify relevant agencies as required. Any reference numbers will be recorded and notified to the Employers Representative.

CEMP APPENDICES (1.1-1.8; 2.1-2.4)
(Retained on site in CEMP Site Folder 1)

1.0 RECORDS INITIATED DURING THE PRE-CONSTRUCTION PHASE

1.1	Project Environmental Risk and Opportunities Register <i>Completed by the Regional/ Project Environmental Manager (in co-operation with the Project Manager)</i>
1.2	Pre-construction Environmental Information <i>Completed by the Project Manager to inform the CEMP</i>
1.3	Waste Management Supplier Pre-Appointment Assessment <i>Completed by the Regional/ Project Environmental Manager upon receipt of supplier information</i>
1.4	Expectations for Removal of Excavated Material from site by a Sub-contractor <i>Completed by the relevant Subcontractor</i>
1.5	Concrete Washout Risk Assessment
1.6	Noise Monitoring Plan
1.7	Site Drainage plan
1.8	Licences, consents, permits or permissions granted to GRAHAM (as detailed in section 1.14 of the CEMP)

2.0 RECORDS OF ENVIRONMENTAL TRAINING AND COMMUNICATION

2.1	Introductory Site Environmental Awareness Training & Environmental Champion Training <i>(Delivered by the Project/ Regional Environmental Manager)</i>
2.2	Spill Kit Training (Training certificate or communication sheets) <i>(Can be delivered by the Project/ Regional Environmental Manager or by the site team (dependant on risk))</i>
2.3	Toolbox talks (Communication sheets)
2.4	Advice Notes (Communication sheets)

Records in bold text are those that must be available for each project. Other records are process and site specific

CEMP APPENDICES (3.1-3.9; 4.1-4.5; 5.1-5.2; 6.1)
(Retained on site in CEMP Site Folder 2)

3.0 ENVIRONMENTAL MEASURING AND MONITORING

3.1 Weekly Site Supervisors Environmental Report

3.2 Water Quality: Visual Inspection Record

3.3 Water Quality – Sampling Record

3.4 Materials Storage Inventory

3.5 Invasive Plants - Record of Monitoring

3.6 Invasive Plants – Record of Treatment

3.7 NRMM Inventory

3.8 Noise Monitoring Report Form

3.9 Dust and Air Quality Monitoring Plan

4.0 WASTE MANAGEMENT

4.1 Duty of Care Waste Transfer Notes

4.2 Details of Permitted, licenced or exempt sites

4.3 Details of Waste Management carriers for transporting waste

4.4 Waste Log (Only if CORA is not used)

4.5 Site Waste Management Plan Datasheet (Only if CORA is not used)

5.0 PERMITS

5.1 Permit to pump and discharge

5.2 Permit to Clear

6.0 AUDITS AND CLOSEOUTS

6.1 (Only if CORA is not used)

Records in bold text are those that must be available for each project. Other records are process and site specific

