

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN



**Land West at Police Row
Therfield
Hertfordshire**

ISSUED: November 2024

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1.0 INTRODUCTION

This Construction Environmental Management Plan (CEMP) incorporates the Management Systems for the project works. It sets out the policies and environmental controls required to ensure that environmental impacts are minimised. It highlights the key activity specific risks, detail control measures, and refers to all associated forms and registers where required. All items specifically required by the client in the CEMP are covered.

1.1 SCOPE

The works comprise the construction of 10 dwellings with associated access, surface water attenuation basin and ancillary works at land off Police Row in Therfield Hertfordshire.

Works are scheduled to commence in February 2025 and will last for a duration of circa 18 Months.

1.2 ISSUE AND REVISION

An electronic version of this Plan, will be issued and held by the Project Contracts Manager. This plan will be maintained and updated regularly by the Project Team with assistance from our Health, Safety and Environmental Manager. This will be in accordance with the construction programme and/or following any changes to regulations and / or corporate procedures.

This CEMP provides a framework to manage the environmental issues associated with the Project, to ensure compliance with Wheatley plc Environmental Policy Statements and legal obligations.

1.3 RESPONSIBILITIES

The Construction Director approves and supports this CEMP as the principal document demonstrating a planned and systematic approach to implementing environmental policy through an effective environmental management system.

The Contracts Manager is responsible for ensuring this CEMP is appropriately reviewed, updated and revised so that it remains effective. The Construction Director is responsible in ensuring it complies with legal amendments and ensures that all project personnel are aware of the contents of this CEMP and understand their role in fulfilling the project's obligations.

The Health, Safety and Environmental Manager is responsible for ensuring it complies with all relevant environmental legal requirements and offering advice in best practice.

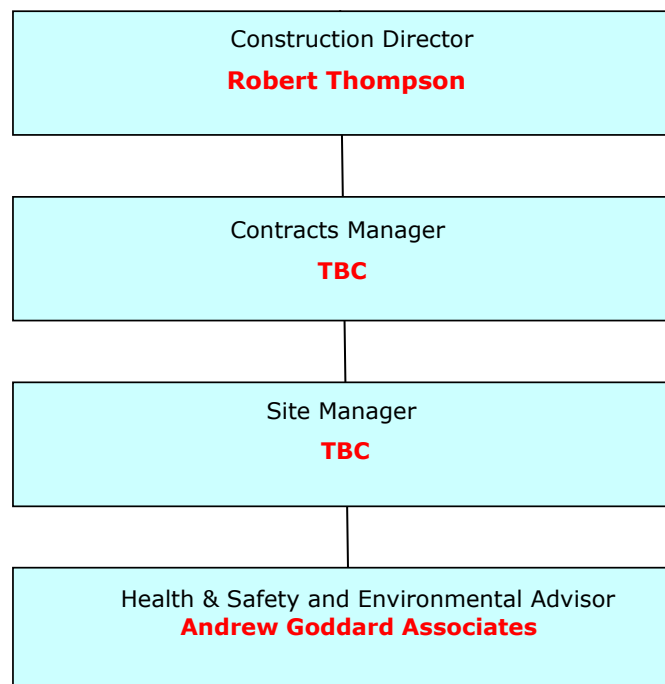
1.4 Project Contacts

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2.0 MANAGEMENT FRAMEWORK

2.1 ENVIRONMENTAL POLICY

The project will comply with the Wheatley plc Environment Policy. The project shall ensure that the policy is made known to all relevant personnel. This will be undertaken through various methods including site inductions, method statements, risk assessment briefings and toolbox talks.

All subcontractors will be provided with a copy of the Environment Policy and Health, Safety and Environmental Terms & Conditions for Sub Contractors that set out the minimum environmental requirements.

2.2 ENVIRONMENTAL RISK ASSESSMENT

An Environmental Risk Assessment identifying significant aspects and impacts identified for the construction phase will be produced and will form part of the project risk register. This will be developed prior to commencement of the construction phase of the project.

The register shall be reviewed and revised monthly or as required e.g. due to changes in the scope of work. Any new environmental aspects and their impacts will be updated accordingly.

The risk scoring system allows the impacts to be prioritised and the most significant identified. For each of the aspects the potential impact is scored for the situation where no mitigation measures are employed and again where mitigation measures are employed.

The register considers the likely environmental impacts from activities being carried out on the project with respect to:

Air
Archaeology
Contaminated land
Ecology - General
Flora – Trees, Plants and Hedgerow
Energy Use
Fuel Storage
Ground
Materials
Noise and Vibration
Nuisance
Waste
Water
Wildlife

This considers activities that are normal construction activities and emergency incidents or accidents.

2.3 LEGISLATION, REGULATION AND OTHER REQUIREMENTS

The Project will comply with all relevant legislation, regulations and Local Authority standards, and comply with all necessary consents to ensure legal compliance across all construction works.

The Construction Director is responsible for ensuring that the project complies with all applicable environmental legislation, regulations and other requirements. A legislation register is maintained by our Health, Safety and Environmental advisor which is updated following any changes legislation. All changes to legislation will be evaluated and communicated to the relevant project personnel through environmental alerts, newsletters, briefings or toolbox talks.

Other requirements and regulations from the Local Authority, Highways Agencies, or other Statutory Bodies will be reviewed by the Project Management Team and implemented where applicable.

2.4 ENVIRONMENTAL OBJECTIVES AND TARGETS

Project specific Objectives and Targets will be formulated. These reflect the issues and requirements of the project our corporate Objectives and Targets.

Objectives and Targets are communicated through a variety of media on a regular basis, this includes, though is not limited to, monthly Project Review meetings, supply chain progress meetings, and regular reporting.

2.5 TRAINING, AWARENESS AND COMPETENCE

All personnel, whose work may cause a significant impact on the environment, will receive environmental training. Environmental training includes, but is not limited to:

Training	Participants
Environment & sustainability element of company induction	All new starters
Environment & sustainability element of site induction	All persons working on site
CITB Site Environmental Awareness: Site Safety Plus (SEATS)	Delegated Duty Holders (Site Based)
Sustainable Timber and Chain of Custody	Delegated Duty Holders (Site Based) and those responsible for timber purchase where necessary
Ecology and Biodiversity	Delegated Duty Holders (Site Based)
CIWM Waste Management Certificate	Delegated Duty Holders (Site Based)
Pollution Prevention And Emergency Spill Response	Delegated Duty Holders (Site Based)
Toolbox Talks on spillage, noise prevention, and other issues relevant to the works	Workforce

Wheatley HR department documents the training provided and will maintain records of the quantity and type of training received so that progress against training targets can be measured. Where relevant, the competency of the attendees will be assessed at the end of the training via an examination.

Where additional training or briefings such as Toolbox Talks are conducted by a third party Labour force to their designated sub-contractor employees they will be responsible for supplying evidence in the form of copies of certification and / or signed attendance sheets.

2.6 INTERNAL COMMUNICATION

Communication of environmental issues within the Project will be maintained through combined monthly project review meetings, chaired by the Contracts Manager.

The environmental section of the agenda for project meetings will primarily address forthcoming activities and will review events and actions arising from the previous activities. Other items on the project meeting's agenda include:

- Progress of consents
- Progress of Work
- Public consultation
- Reporting of monitoring results
- Actions arising from site inspections, incidents, complaints and audits
- Planned work and risks associated with this

Newsletters, bulletins, posters etc. will be produced and displayed in the site offices on a regular basis to raise awareness of current issues both within the Project team and throughout the local community.

It is recognised that benefits can be gained from close co-operation with sub-contractors in achieving best practice.

The Contracts Manager and Site Manager will ensure that meetings and discussions are carried out in a spirit of openness and co-operation to determine lessons learnt from any incident and wherever practicable act to mitigate similar risks.

2.7 EXTERNAL COMMUNICATION

Wheatley will agree with the Local Authority a process for public consultation. The agreed process will be documented either in a Community Liaison Procedure or this CEMP.

The procedure may be required to demonstrate to the Local Authority the way local residents, landowners, businesses etc. will be informed of the consequences of work activities and how we will mitigate any impact.

Any agreed consultation and liaison arrangements will be maintained throughout the construction phase and will include but not be limited to:

- Consultation with the relevant statutory bodies (e.g. Local Authority, Environment Agency, Natural England).
- Presentations to residents' representatives and any other interested parties regarding future programme of works.

Where disturbance to residents or businesses is likely, the Project management will inform residents and businesses in advance of the work via a letter drop.

Typical third parties include, but are not limited to:

- Local Authority Environmental Health, Environment and Planning Department.
- Highways.
- Environment Agency.
- Statutory Utilities – Gas, Electric, Water, Telecoms.
- Neighbourhood Residents.
- Emergency Services.

Wheatley will consult with third parties where it is considered the works will cause any impact or where access or storage may be required. In addition, third parties may be contacted to gain permission to carry out certain protected species surveys if required.

2.8 RECORDS

This document is the principal operating document for environmental management of the Project. The CEMP defines policies and arrangements for the main environmental issues. The other documents: environmental procedures, schedules, work package plans and records will all be developed from the CEMP and together form the Environmental Management System for the Project.

2.9 MANAGEMENT REVIEW

The Construction Director will undertake a review of the project and include the following information for input into the annual management review:

- Follow-up actions from previous management reviews;
- Results of internal audits and evaluations of compliance with legal and other requirements;
- Communication from external interested parties, including complaints;
- The extent to which objectives and targets have been met;
- KPI data;
- Changing circumstances, including developments in legal and other requirements related to the environmental aspects;
- Recommendations for improvement.

3.0 SITE SPECIFIC CONTROLS

3.1 EMISSIONS, MONITORING AND MEASUREMENT

We recognise a distinction between active and reactive monitoring as follows:

Active	Reactive
Site Management.	Incident reporting.
Boundary and watercourse inspection.	Complaint recording and investigation.
Health, Safety and Environmental inspection.	Water sampling where necessary.
Environmental Duty Holders Site Inspection.	
Senior Managers & Directors Tours.	
Internal inspections and audits.	
Noise and vibration monitoring.	
Advance planning of operations generating dust.	

The table below identifies examples of environmental risks and measures that will be taken to eliminate or reduce the risk. This is not a complete list.

Emissions	Potential Receptor	Monitoring and control measures	Level of emissions
Diesel fuel	Land & Water	Monitor the amount coming onto site to ensure it is kept to a minimum. Storage tanks will be bunded with drip trays when refueling operations are undertaken. Emergency spill kits will be readily available. Storage will be in an area of the site where there will be a low risk of impact or collision, > 10m from any watercourse, > 50m from any borehole, well or spring, and open drains. The management and storage of diesel fuel will be in keeping with HSE HSG176 "Storage of flammable liquids in tanks" and the Control of Pollution (Oil Storage) (England) Regulations 2001	Low
Paints	Land & Water	Water based paints to be used and when not in use stored in a locked area.	Low
Other chemicals	Land & Water	Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH) assessments to be undertaken for all chemicals and control measures applied. Specific monitoring regimes to be implemented as required	Low

Silt run off	Land, water borne	Measures to be put in place to prevent run off into the neighboring watercourse.	Low
Dust	Land, Water and Air	Tarmac / concrete haul roads to be put in place early and site strip to be kept to a minimum. Damping down to take place as appropriate. Adjacent watercourse to be protected against silting. Dust to be monitored as required. <u>Regular road sweeping during dry periods of weather.</u>	Low
Wheel born mud and soils	Roads	Road condition to be monitored on ongoing basis by site management. Tarmac / concrete haul roads to be put in place early. Wheel wash to be used during earthworks. Road sweeping to be used as required.	Medium
Concrete wash water	Land & Water	Designated area to be established for the washing out of concrete. Any waste to be recycled or disposed in an environmental manner	Low
Plant & vehicles	Atmosphere	Maintenance regime in place for all site plant and monitored for all plant and vehicles. All vehicles and site plant to be turned off when not in use. Shared transport to and from the site will be encouraged where practicable.	Low

3.2 VERMIN AND PEST CONTROL

Welfare facilities (canteens, mess rooms, drying rooms, toilets etc.) will be provided for the project. These will be cleaned daily and maintained in a good condition. It is expected that the users behave properly towards the facilities provided. All food and drink will be disposed of in a lidded container and emptied on regularly. Anyone found to be abusing welfare facilities will be dismissed from the site.

All food and drink is to be consumed within the mess rooms and the site canteen. Consumption of food outside of welfare facilities encourages the spread of vermin causing further potential occupational health risks, e.g. leptospirosis (Weil's disease).

3.3 PREVENTION, CONTAINMENT AND CLEANING UP SPILLAGES

Liquid storage

A suitable and sufficient COSHH assessment will be prepared for all hazardous material to determine most practicable means to prevent polluting materials from entering the hydrological systems and other aspects of the environment.

All fuels will be stored in compliance with the Control of Pollution (Oil Storage) Regulations 2001. Diesel fuel shall be stored in dedicated bunded, impervious storage areas, away from drains and watercourses.

Drums over 200 litres shall be stored on drip trays capable of holding 25% of the drum's maximum capacity. Fuel tanks shall be stored within a bund capable of holding 110% of their capacity. All pipes and

gauges shall be within the wall of the bund. Spill kits will be available at various points around the site and located next to bowzers and drums.

Solid

Spillages of dry and dusty materials will be avoided by good housekeeping methods including storing under cover and on hard standing. Skips will be covered where there is a risk of material becoming airborne.

Wheels of site vehicles will be cleaned before they leave site. This will be supplemented by a road brush to clean roads as required; this will prevent tracking of mud and debris onto surrounding routes.

Dealing with spills

Spill kits will be available at various points around the site and located next to bowzers and drums. Should a spill occur the following will be implemented:

- Work will be stopped immediately;
- All possible ignitions will be extinguished if the spilt material is flammable;
- The spill will be contained using spill kits;
- The source will be identified and sealed as practicable;
- Granules / pads to will be used to absorb as much spill as possible;
- The Contracts Manager will be informed of the spill by the Site Manager;
- In the unlikely event of the spill entering the nearby watercourse we will contact the Environment Agency immediately;
- The granular material and pads and any containment items will be treated as hazardous waste and disposed of accordingly.

An incident report form will be produced by our Health, Safety and Environmental Manager within 24 hours of the incident occurring.

3.4 FIRE CONTROL

General

The necessity for hot work to be carried out on site will be eliminated by all project designers and our subcontractors so far as is reasonable practicable. A fire risk assessment will be developed to comply with the Regulatory Reform (Fire Safety) Order 2005 (as amended). The management of hazards where fire can breakout will be undertaken in line with HSE HSG168 "Fire safety in construction" and the "Joint Code of Practice on the Protection from Fire on Construction Sites and Buildings Undergoing Renovation"

A Site Fire Safety Coordinator will be appointed to ensure adherence to develop and manage a Site Fire Emergency Plan. In addition, they will coordinate the issues below:

- Ensure suitable fire points including sounders, are located throughout the site;
- Ensure evacuation plans and procedures for calling the fire brigade are fully developed;
- Ensure instructions in the event of an emergency are communicated to all site personnel;
- Implement effective security measures to reduce the risk of arson;
- General housekeeping, removing and limiting storage of material that may increase fire loading;
- Implement a robust Hot Work Permit regime as necessary;

- Ensure fire escapes remain clear at all times;
- Fire brigade access, facilities and coordination;
- Fire drills are carried out;
- Prohibit burning on site.

The fire risk assessment will be reviewed and updated as the construction phase develops. In addition, weekly inspections of all areas will be carried out and the findings recorded on a weekly inspection report. All areas will be kept clean and tidy and stored materials will be properly coordinated and controlled.

Waste Management and Storage of Materials

During the construction phase the site will be kept free from the buildup of combustible materials. Pedestrian routes through the building will be kept clear of stored materials.

Storage of Materials

We will operate a 'just in time' delivery system with all deliveries needing to be booked in advance of the delivery. These will ensure that there will be minimal storage within the dwellings under construction.

Fire Points

Fire Station Points will be located at key strategic positions throughout the site, including the site compound and site office accommodation.

In general terms each fire point will consist of

- Water extinguisher;
- AFFF Foam extinguisher (Aqueous Film Forming Foam) – where applicable;
- CO₂ Gas extinguisher – where applicable;
- Alarm sounder / rotary bell;
- Fire blanket in food preparation areas;
- You Are Here plan;

The Fire Points will be checked daily by appointed persons and weekly by the site safety supervisor. Evacuation signage will be posted and maintained as the construction phase progresses.

3.5 TREATMENT OF EFFLUENTS

Any connections or discharges to drains and/or controlled waters will not be undertaken without approval and where required, the necessary consent being issued.

Until temporary connections for the project welfare facilities are made, all W/C and kitchen drainage waste will be stored in tanks. These tanks will be cleaned out on a regular basis by a specialist waste disposal organization.

Discharges will only be made to drains and sewers with appropriate consents providers and regulators.

3.6 NUISANCE TO NEIGHBOURS AND POLLUTION TO THE LOCAL ENVIRONMENT

The Environmental Risk Assessment will highlight what the potential environment impacts will be and how they will be effectively mitigated.

Any complaints will be forwarded to the Site Manager to address. Once these have been dealt with they will be recorded in the project file.

Construction activities will be undertaken in line with planning conditions and are generally limited to the following hours:

- 08:00 to 18:00 Hours Monday to Friday
- 08:00 to 13:00 Hours Saturdays
- No work to be carried out Sundays and Bank Holidays,

3.7 TRAFFIC AND TRANSPORTATION

Traffic both on and off site will be managed to minimize the impact of site operations and the local community. A traffic management plan will be developed prior to start on site. Throughout the duration of the construction phase we will ensure the plan is appropriately reviewed, updated and revised, so that it remains effective.

Deliveries will be limited to the following hours:

- 08:00 to 18:00 Hours Monday to Friday
- 08:00 to 13:00 Hours Saturdays
- No work to be carried out Sundays and Bank Holidays,

On site, the following be implemented:

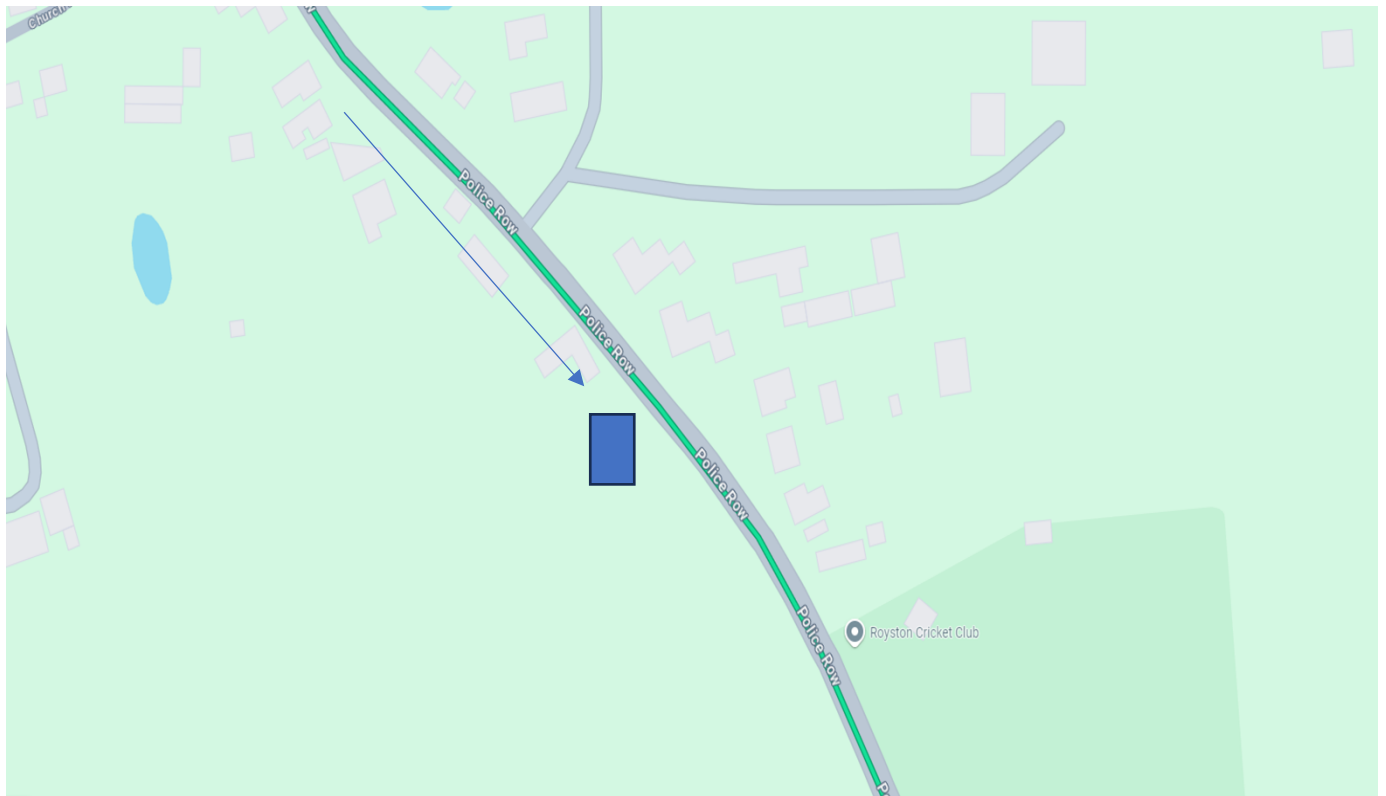
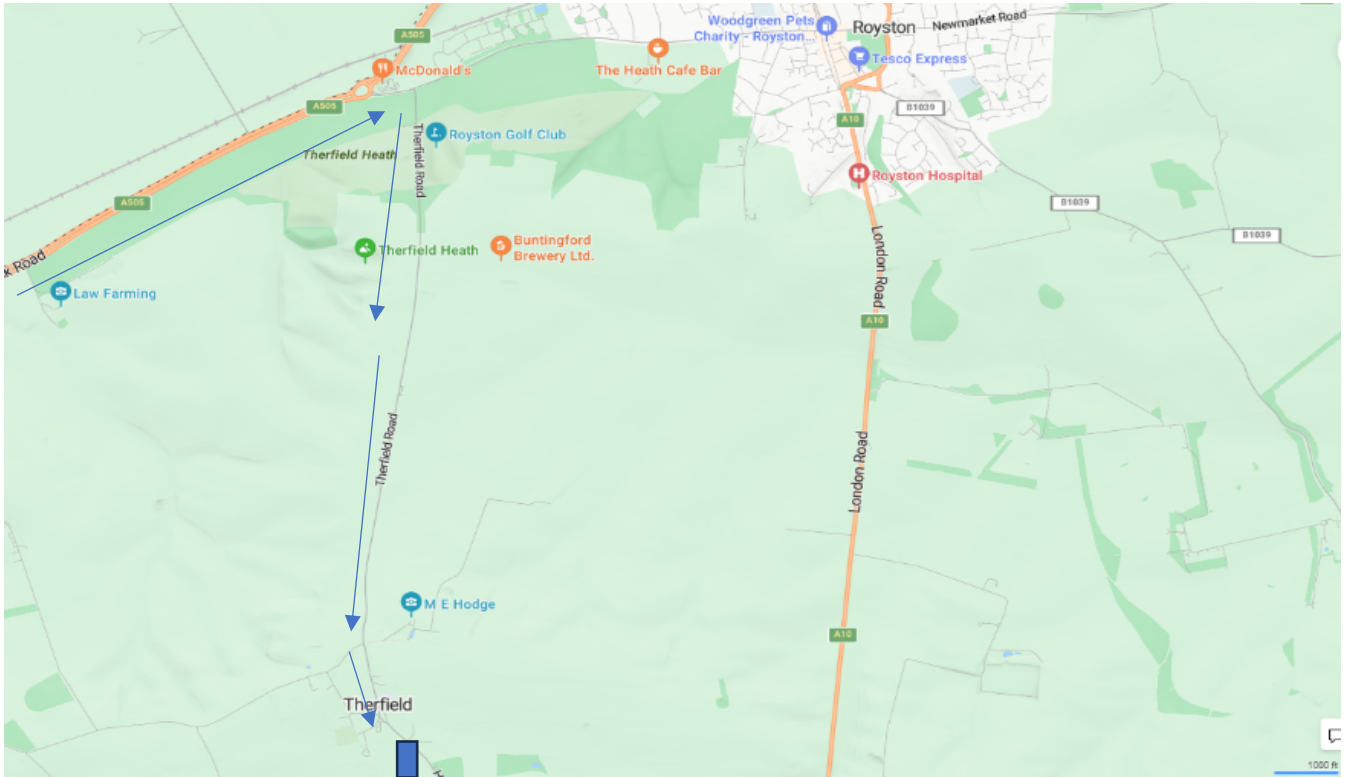
- Switching off vehicle engines when not required.
- Parking provided on site where practicable.
- Use of wheel washing processes as appropriate.
- Preparation of hard-standing.
- Scheduling of deliveries.
- Site speed limits on access roads.
- Removing debris from public roads by mechanical road sweeper.

All site traffic will be directed into the site via the designated entrance points and will be turned on site to prevent HGV's reversing out on to Police Row.

Contractor parking will be allowed for on site in designated areas.

Wheatley

Access and egress to and from the site will be from A505, turning onto the Baldock Road towards Royston. Traffic will then turn right onto the Therfield Road, following straight onto the Causeway and into Police Row towards Hay Green, the site is located on the Left hand side of the road.



Signage will be posted to direct all vehicles to the site.

3.8 DUST AND NOISE

There is the potential for dust emissions to arise during the construction phase of the development, appropriate dust control procedures to ensure that construction dust does not pose a nuisance threat to nearby residential properties. This risk will be reduced by the construction of the primary estate roads with a tarmacadam base course early in the construction phase. Where this is not practical, e.g. domestic drive ways, dampening down will be carried out during long-term dry periods. In addition, the speed limit on site will be set at maximum 10 MPH.

Those most at risk to emissions from the proposed development include neighboring houses. If significant quantities of dust were to be generated deposition rates are likely to be low and unlikely to constitute a reasonable cause for nuisance complaints.

To prevent unacceptable impact from dust, control measures will be employed as and when necessary. These may include damping down dusty surfaces, controlling the speed of mobile plant crossing un-surfaced areas, mechanical road sweeper on public road; sheeting HGVs carrying dusty loads. The residual impact at the nearest residential properties is expected to be negligible. These procedures will be written into the construction management plan.

The following specific mitigation measures may be appropriate to control fugitive dust emissions during the construction phase:

- Provision of debris screening and damping down;
- The site vehicular exit route is to be kept clean and vehicles transporting dusty materials will be covered;
- All vehicles leaving the site will be inspected and cleaned as necessary;
- All site traffic will be instructed to keep to designated haul routes to reduce the break down and subsequent escape of fine material into the atmosphere.

It is considered that fugitive dust emissions during the construction phase of the project are expected to be minimal.

Construction work will be planned and managed to comply with BS 5228:2009 + A1:2014 Code of practice for noise and vibration control on construction and open sites.

3.9 AIR POLLUTION

Air pollution such as odours and fumes may arise from the following activities:

- Use of heavy plant and machinery;
- Road vehicles, particularly HGVs.

Air pollution will be managed to reduce impacts to a minimum, and to eliminate where practicable. Management will be achieved through:

- All fuels, oils and other Volatile Organic Compounds (VOC's) will be stored as instructed by manufactures safety data sheet and following COSHH assessment;
- Consideration will be given to prefabricated materials where possible to reduce localised air born emissions and contamination;
- Vehicles and plant will be switched off when not in use;
- Ensure vehicles and plant are not over loaded to reduce exhaust emissions;
- Modern, properly maintained plant and equipment is used;
- Mains electricity supply will be used in preference to generators where practicable.

All work activities will be carried out in accordance with Environment Legislation and guidance.

3.10 ARCHAEOLOGY AND BUILT HERITAGE

The Environmental Statement makes no reference to any known Archaeology. In the unlikely event that any archaeological remains are found during ground works, the Site Manager shall cease works and consult with the Local Authority Archaeologist as soon as practicable.

3.11 ECOLOGY

No known protected species, sites or invasive of injurious species have been identified as being affected by the works.

There are no Tree Protection Orders on site, however there are numerous trees to be retained. These are detailed in the approved Arboricultural report produced by Maydencroft.

Any disturbance or unexpected discovery of protected or invasive species will be reported in line with the Emergency Response Plan. In all cases, works will cease until guidance is given by our Health, Safety and Environmental Manager.

3.12 LANDSCAPE AND VISUAL

The designers have taken measures to control the visual impact of the site following consultation with North Hertfordshire Planning department.

Where lighting is needed overnight for security purposes, this will be low level lighting, directed away from sensitive areas such as neighboring properties.

A painted timber hoarding with gated vehicular and pedestrian access routes will be erected instead of Heras fencing along boundaries where there is an interface with the public. This will reduce visual intrusion, assist in noise attenuation and ensure public safety, and reduce the risk of unauthorised access. Any damage or vandalism will be rectified as soon as reasonably practicable. The boundary fence will be maintained and regularly inspected to an acceptable standard.

SITE WELFARE

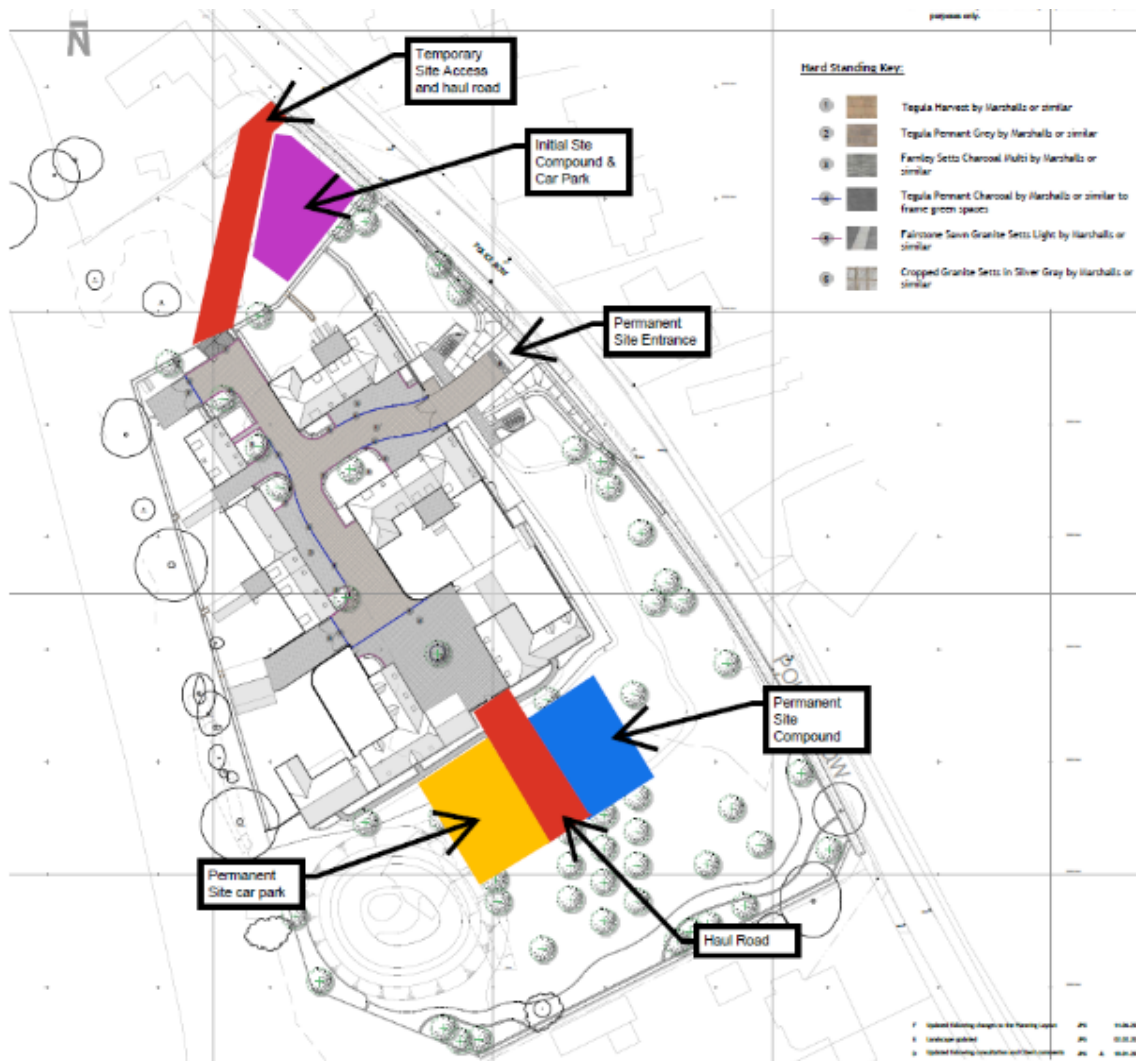
A site compound and car parking will be established in two phases:

Initially a self-contained Oasis unit will be used for site welfare along with a hard standing area for car parking whilst we form up the site roads and permanent compound.

We will then form up the permanent site compound and car park consisting of:

- Double stacked temporary site office;
- Site canteen;
- W/C facilities and drying rooms;
- Lockable storage containers;
- Designated external material storage area; and contractor's car parking.

The proposed location of the site compounds and car parking areas are shown below:



We have endeavored to prevent significant environmental impacts beyond the boundaries of the work sites.

Measures to control the visual impact of the works and to preserve and reinstate any damage to landscaped areas will be taken, including:

- Considerate positioning of new structures;
- Selection of appropriate materials in consultation with Central Bedfordshire planning department;
- Avoidance of unnecessary tree and vegetation removal;
- Additional planting and landscaping;
- Good housekeeping arrangements, keeping all sites in a tidy manner and prevent release of litter and mud accumulation on public roads;
- Use of temporary hoardings;
- Restrictions on lighting to prevent light pollution;
- On site temporary parking.

On completion of the project the compound will be dismantled and removed, and the area completed as agreed with the planning authority.

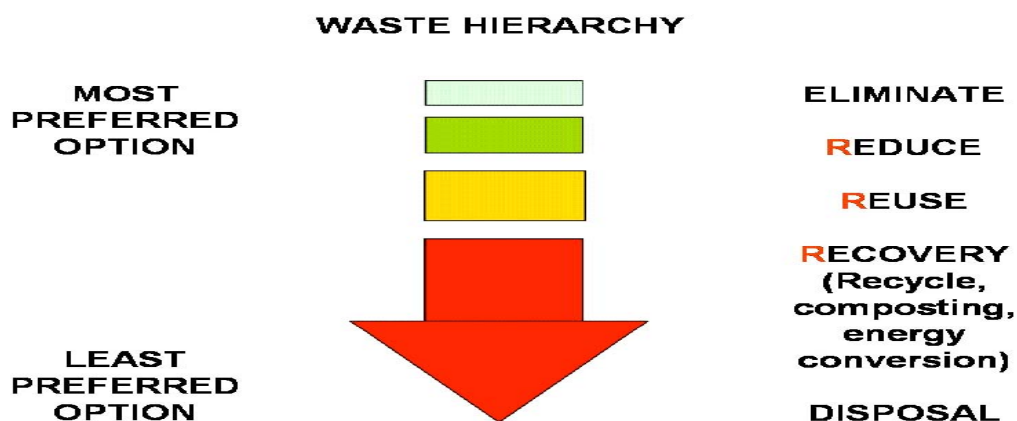
3.13 FLOOD RISK AND DRAINAGE

The approved Flood Risk Assessment and Drainage strategy produced by Wood Hardwick states that:

- The site is located with Flood Zone 1 and has a 1 in 1000 probability of flooding.
- The site will not materially increase the potential of the existing area flooding.
- The Storm water strategy will be a sustainable solution and allows 1 40% climate change in accordance with LLFA guidance.
- Foul Water will be discharged via the existing Anglian water network.

3.14 WASTE

Site generated waste will be carefully managed throughout the duration of the construction phase using the below waste management hierarchy of control to reduce and manage waste:



We will detail this by focusing on the below criteria:

- The waste material category generated by the project;
- Opportunities for reuse and / or recycling;
- Proposed methods of storage, segregation, handling and transportation of waste;
- Means of disposal including licensing requirements of carriers and destination sites;
- Recording of all waste movements from the site;
- Reporting and monitoring process;

A waste register will record waste collections. Copies of waste transfer notes will be collated and recorded. This information will be retained in the site managers office and retained the Wheatley plc office for an additional two years following practical completion.

All waste will be handled and disposed of in line with the “Duty of Care” Regulations. It is the responsibility of all persons on site to dispose of waste in the correct receptacles and to report any waste being stored incorrectly or escaping from the site area.

Opportunities to minimise waste through the design process have been considered and actions taken where they have been identified and are cost effective.

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