

# Construction, Environmental Management Plan (CEMP)

For

Rascals Farm, Southwater

At

Rascals Farm

Southwater

West Sussex

RH13 9BG

For and on behalf of

Barratt Redrow Southern Counties (BDW Southern Counties)

Prepared by:

**Ben Magson**

For and on behalf of:

Fulkers Bailey Russell (FBR)

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## Revision and Amendment Record

| Rev No: | Produced by: | Amendment(s) | Checked by | Issue Date |
|---------|--------------|--------------|------------|------------|
| 00      | Ben Magson   | Original     |            | 28/01/2026 |
| 01      |              |              |            |            |
| 02      |              |              |            |            |
| 03      |              |              |            |            |

## Overview:

- **Description:** 96 homes in single phase; access, roads, drainage, landscaping; S73 layout being updated.
- **Abbreviations:** LPA, BDW, FBR, PD, PC, CLP, CTMP, RAMS, H&S, EA, EPR, IAQM, BS 5228

## Purpose of Health & Safety file update to, purpose of the CEMP

### 1. Introduction

#### 1.1. Purpose of the CEMP

This Construction Environmental Management Plan (CEMP) sets out the minimum environmental management requirements for the construction phase of the proposed development at Rascals Farm, Southwater, West Sussex. The CEMP defines roles and responsibilities, control measures, and monitoring arrangements to minimise environmental impacts and nuisance during construction, and to demonstrate how relevant planning requirements and best practice guidance will be met.

This CEMP is a live document and shall be reviewed and updated at defined project milestones and following any material change to the programme, methodology, site constraints, or stakeholder requirements. The Principal Contractor (PC) shall adopt and implement this CEMP (and any approved updates) prior to commencement on site and shall ensure that all subcontractors comply with its requirements.

This document has been developed to avoid, minimise and mitigate construction effects on the environment and surrounding community throughout the works.

For the purposes of this document, the working area is defined as any area required for temporary or permanent works to facilitate construction of the development, including access routes, temporary construction areas, compounds, and temporary storage areas.

## 2. Regulatory Framework and Planning Conditions

### 2.1 Planning Status and Condition Discharge

This Construction Environmental Management Plan (CEMP) has been prepared in support of Planning Condition 6 pursuant to the Outline Planning Consent Ref. DC/20/0695, as amended by Section 73 Consent Ref. DC/21/2126, for the development at Rascals Farm, Southwater, West Sussex. The site also benefits from Reserved Matters Consent Ref. DC/24/0249.

This CEMP is submitted for formal approval to discharge the relevant planning conditions and establishes the minimum environmental management requirements for the construction phase.

In accordance with Planning Condition 6, this CEMP includes the following measures:

1. An introduction containing:
  - a description of the construction programme
  - definitions and abbreviations
  - project description and site location
2. Resident communication arrangements, including how residents will be advised of site management responsibilities and contact details.
3. Detailed site logistics, including:
  - site compound locations
  - areas for loading/unloading of plant and materials
  - site office locations (including height and scale)
  - storage arrangements for materials, including stripped topsoil
4. Parking arrangements for site operatives and visitors, delivery management and storage arrangements.
5. Construction access arrangements, defining the method of access and egress to and from the site.
6. Public consultation and liaison measures, including the approach to newsletters, notifications, and engagement prior to and during construction.
7. Temporary lighting details, including:
  - lighting locations
  - height, type and direction of luminaires
  - hours of operation
  - light intensity
8. Wheel-washing and dust-suppression arrangements, including locations, operational controls, and maintenance requirements.

All construction activities shall be undertaken in full accordance with the details, measures, and controls approved within this CEMP, and the Principal Contractor shall implement and maintain these arrangements throughout the construction phase.

### 2.2 Policy Context and Purpose

This CEMP has been prepared to implement the core principles of relevant local planning policy and to demonstrate how environmental controls will be applied during the construction phase with due regard to applicable environmental legislation and recognised good practice.

The CEMP provides a framework for managing, monitoring and controlling environmental risks during the works. It is intended to:

- Ensure that appropriate environmental management arrangements and control measures are in place for enabling and construction activities, with continuous review of potential environmental effects.
- Ensure that enabling, demolition (if applicable) and construction activities are planned and undertaken to minimise nuisance and disruption to local residents, neighbouring land users and members of the public.
- Ensure that mitigation measures are implemented, maintained and adjusted where required.

- Ensure that applicable legislation, relevant government guidance, industry standards and construction best practice are followed.

### 2.3 Legislation, Standards and Guidance

This CEMP has been developed with reference to relevant legislation, planning policy and recognised best practice guidance, including (but not limited to):

- **BS 5228-1 and BS 5228-2** – Code of practice for noise and vibration control on construction and open sites.
- **IAQM Guidance** – Assessment and control of dust and emissions from construction and demolition.
- **Environment Agency** pollution prevention principles and incident response expectations.
- **Waste Duty of Care** requirements and application of the waste hierarchy.
- **CLOCS** principles for construction logistics and road risk management, where applicable.

The Principal Contractor shall also comply with any additional requirements set by the LPA and any project-specific approvals, permits, or consents relevant to environmental management.

## 3. Site Location and Operating Hours

The site is located at Rascals Farm, Southwater, West Sussex, with principal construction access taken from Shipley Road to the north-east. The surrounding context includes nearby residential properties, public routes, and retained landscape features. The Principal Contractor (PC) shall identify sensitive receptors and remain aware of all activities that may cause nuisance or environmental harm throughout the construction phase.

Key constraints and considerations include:

- Existing tenancy until March 2026: Construction access and enabling activities shall be planned to avoid conflict with tenant operations and agreed site boundaries/controls.
- In accordance with Planning Condition 5 of the Reserved Matters Approval, no development shall commence, including demolition pursuant to the permission granted, ground clearance, or the bringing of equipment, machinery, or materials onto the site, until the following requirements have been completed in the sequence set out below: [\[Rascals Fa...s - Kristy | Word\]](#)
  1. All trees identified for retention on the approved Tree Strategy Plan (Ref: GLS\_160\_143\_1500 Rev C), the Arboricultural Method Statement (Ref: CC39-1039), and any off-site trees where Root Protection Areas (RPAs) extend into the site, shall be fully protected throughout all construction works.
  2. Tree protection fencing shall:
    - be installed prior to any works commencing,
    - be affixed firmly to the ground,
    - comply fully with Section 6 of BS 5837:2012 – “Trees in Relation to Design, Demolition and Construction – Recommendations.”
  3. Once installed, protective fencing shall be maintained throughout the development, and shall remain in place until all machinery, surplus materials, and construction plant have been removed from site.
  4. Protected areas shall be treated as zones of prohibited access, with:
    - no storage of materials, machinery, or equipment;
    - no mixing of cement, concrete, or use of other harmful materials;
    - no operations taking place close enough to cause seepage or contamination into RPAs.
  5. Any trees or hedges that die or become damaged during construction shall be replaced with planting of a type, size and location agreed with the Local Planning Authority (LPA).
- Overhead services (LV and BT): Exclusion zones and safe working clearances shall be maintained at all times; any works near services shall be planned and controlled through permits and RAMS.

The PC shall confirm receptor locations, constraints and protection measures during pre-start planning and include

these within the Construction Logistics Plan (CLP) and site layout drawings.

Figures 1 below refers to the proposed development detailed above.



#### Site Setup and Logistics (Indicative)

- **Site compound:** The initial site compound is proposed adjacent to the north-east entrance off Shipley Road and shall be located outside all Root Protection Areas (RPAs). The final compound location shall be confirmed by the Principal Contractor (PC) in consultation with the Project Arboriculturist and shall be shown on the approved site layout plan.
- **Loading / unloading:** All loading and unloading shall be undertaken within the site boundary (within designated areas) and shall not take place on the public highway. A competent banksman/traffic marshal shall control vehicle movements during deliveries and collections.
- **Site offices / welfare:** Welfare and office facilities shall comprise modular units not exceeding two storeys (approximately 6 m) in height. Units shall be finished in pale, non-reflective colours and positioned to minimise overlooking and light spill to neighbouring receptors.
- **Storage and stockpiles:** Storage and laydown areas shall be segregated and clearly designated. Stripped topsoil shall be stockpiled to a maximum height of 3 m, protected as necessary (e.g., geotextile sheeting) and located outside RPAs. Appropriate sediment and runoff controls shall be provided to prevent migration of silt and debris.

**Note:** The PC shall provide an A3 site layout plan prior to commencement showing compound location, welfare, storage/laydown areas, stockpiles, access/egress, wheel-wash (if required), and drainage protection measures.

### 3.1 Site Operations & Operating Hours

In accordance with Condition 21 of the Outline Planning Consent, demolition or construction works (including deliveries and dispatch) shall only take place during the following permitted hours:

- Monday to Friday: 08:00 – 18:00
- Saturday: 09:00 – 13:00
- Sundays and Bank/Public Holidays: No works permitted

Start-up and close-down activities (e.g., unlocking, briefings, safety checks, plant inspections) may occur up to 30 minutes either side of the permitted hours. These activities must be non-intrusive and must not involve noisy works, engine revving, or operation of plant that may cause disturbance to nearby receptors.

All construction activities must comply with the approved working hours and any additional requirements agreed with the Local Planning Authority (LPA). Where applicable, a Section 61 Consent under the Control of Pollution Act 1974 may be sought; however, any such agreement must not conflict with the restrictions of Condition 21.

Final working hours shall therefore comply with:

- Outline Consent Condition 21
- Any subsequent approvals or written agreements issued by the LPA
- Any Section 61 agreement (if used), provided it does not override Condition 21

### 3.2 Parking, Deliveries and Storage (Site Controls)

#### **Parking**

On-site parking shall be provided for operatives and visitors. No parking shall take place on Shipley Road. Visitor and accessible bays shall be allocated and clearly marked.

Deliveries and booking-in

#### **Deliveries and booking-in**

A delivery booking-in system shall be implemented to control vehicle arrivals and prevent congestion. Deliveries should be programmed to avoid peak local traffic periods, including school peak times where applicable. Loads shall be consolidated where practicable to reduce vehicle movements. A wheel-wash and/or wheel-cleaning arrangement shall be provided where required to prevent mud and debris being tracked onto the public highway.

#### **Storage and housekeeping**

Materials shall be stored in designated areas within the site boundary. Fuel, oils and chemicals shall be stored within bunded and secure areas with appropriate spill response equipment available. Waste shall be segregated in clearly labelled areas and removed by licensed carriers in accordance with Duty of Care requirements.

### 3.3 Site Access / Egress and Highway Controls

Site access and egress shall be via Shipley Road (north-east gate). Construction traffic shall be managed to minimise impacts to the local road network and neighbouring receptors. The Principal Contractor shall prepare and implement a Construction Logistics Plan (CLP) and, where required, a Construction Traffic Management Plan (CTMP), which shall define (as a minimum):

- approved vehicle routing and any restricted roads/areas;
- delivery time windows and booking-in arrangements;
- gate management procedures and signage;
- banksman/traffic marshal protocols; and
- measures to maintain road cleanliness (including road sweeping where necessary).

A pre-start **highway condition survey** shall be undertaken where required/agreeable with the relevant authority and photographic records retained. Road sweeping and/or jet washing shall be implemented as necessary to maintain cleanliness of the public highway and footways.

### 3.4 Temporary Lighting

Temporary lighting shall be designed and operated to minimise obtrusive light and nuisance to neighbouring receptors. As a minimum:

- LED task/flood lighting shall be used where practicable;
- lighting columns/masts shall not exceed 6 m in height unless specifically justified;
- lighting shall be directed downwards and fitted with shielding/baffles to prevent light spill and upward light; and
- lighting use shall be aligned with site operating hours. Any exceptions (e.g., emergency works) shall be managed and agreed where required.

Lighting design and operation shall follow the Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light (GN01).

### 3.5 Roles and Responsibilities

#### Environmental Management Responsibilities

Overall responsibility for environmental compliance during the construction phase rests with the Principal Contractor (PC). The PC shall appoint a competent Site Manager and/or Environmental Lead to implement this CEMP, brief the workforce, coordinate subcontractors, and maintain inspection and records systems.

Key responsibilities include:

- **Client (BDW / Barratt Redrow):** Will set project environmental expectations, review key submissions where required, and liaise with the LPA as appropriate.
- **Principal Contractor:** Shall prepare and implement detailed construction phase arrangements (including CLP/CTMP/TMP as required), ensure subcontractor compliance, and maintain records demonstrating implementation of controls.
- **Project Team (FBR / consultants):** Will provide support and review/advise where appointed to do so; this does not remove the PC's duties to manage environmental risk on site.
- **All subcontractors:** Shall comply with this CEMP, site rules, RAMS, and any approved traffic, waste, and pollution prevention arrangements.

Draft CEMP for planning / condition discharge - roles to be confirmed pre-commencement

|  | Role                       | Organisation                                                             | Contact Details                                                             |
|--|----------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------------------------|
|  | Client (Assistant Planner) | <b>Barratt Redrow Southern Counties</b><br>Compton House<br>The Guildway | Contact – Kristina King<br>T: 07392 286374<br>E: kristy.king@bdwhomes.co.uk |

|                  |                                |                                                                               |                                                                                   |
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| Parties Involved |                                | Old Portsmouth Road<br>Guildford<br>Surrey<br>GU3 1LR                         |                                                                                   |
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|                  |                                |                                                                               |                                                                                   |
|                  |                                |                                                                               |                                                                                   |
|                  |                                |                                                                               |                                                                                   |
|                  |                                |                                                                               |                                                                                   |

3.6 Proposed Site Plan



4. Construction Programme, Methodology and Management

It is anticipated that construction of the proposed development will take approximately 27 months following receipt of a planning consent.

Table 1 below will be updated following receipt of planning approval with target completion dates.

|  | Construction Stage                           | Start     |
|--|----------------------------------------------|-----------|
|  | Winter groundwater monitoring                | Oct-25    |
|  | Working drawings                             | Mar-26    |
|  | Start on site (enabling, SI, site clearance) | Jul-26    |
|  | Site launch (Sales Arena)                    | Sept 2026 |
|  | Last occupation                              | Sept 2028 |

#### 4.1 Method of Construction

The proposed buildings will be built using traditional construction methods and facilitated by a telescopic forklift and the use of a mobile crane as required.

Construction phase works will include;

1. Hoarding and security of the site
2. The establishment of the welfare compound for the construction phase of the project
3. Soft strip and enabling works
4. Removal of material and underground obstructions (if encountered)
5. Foundations
6. Construction of the dwellings in a progressive manner
7. Internal works
8. Pre completion testing
9. Landscaping and final works
10. Programmed handovers and occupation

A Construction Phase Health and Safety and Environmental plan will be prepared for this which will include the following details;

- Organisational chart and responsibilities
- Health and Safety and Environmental monitoring
- Generic Risk Assessment
- Method Statement checking process
- Site specific plans i.e. lifting plans, temporary works, pollution prevention
- Accident and incident investigation
- Emergency arrangement

The information in the above-mentioned document will highlight the safety checks and procedures that should be in place during the construction of this development. All Personnel will be inducted into this document

#### 4.2 Construction Site Access and Vehicle Routes

##### **Logistics Plan**

A Construction Logistics Plan (CLP) shall be prepared and implemented by the appointed Principal Contractor (PC) prior to commencement. The CLP shall include, as a minimum: delivery management procedures, routing arrangements, booking-in systems, a pre-commencement highway condition survey (where required), wheel-washing/road-sweeping arrangements, and measures to reduce congestion and environmental impact

##### **Wheel Washing and Road Cleanliness**

Wheel washing stations will be installed where required, and their locations will align with the arrangements described in Sections 3.2 and 3.3 of this CEMP. A road sweeper will be deployed in accordance with site conditions, weather, and soil movements, and haul routes will be damped down where required to minimise dust and debris.

##### **Dust and Emissions Controls**

The PC shall adopt the IAQM "Assessment of Dust from Demolition and Construction" (2024 v2.2) as the basis for risk-based mitigation and monitoring. Dust-generating activities will be controlled in accordance with the CEMP, with enhanced measures applied during the demolition of the existing house only, as this is the sole demolition activity applicable to the project.

### **Site Access Arrangements**

The primary construction access is located at the north-east of the site off Shipley Road, as identified by the Client and shown in Appendix 1

There is also scope to utilise an existing secondary access point located at the south-east corner of the site, which may be used only subject to obtaining Section 171 approval and all associated permissions from the relevant highway authority. This access will not be brought into use unless and until the necessary approvals are granted.

The controls and arrangements set out in the CLP shall be implemented prior to commencement of development.

### **CLP Objectives**

The Construction Logistics Plan has been developed to ensure that:

- Construction materials are delivered and waste is removed in a safe, efficient, and environmentally responsible manner.
- The construction process reduces congestion on local roads and minimises environmental impacts.
- CO<sub>2</sub> emissions are reduced through consolidated deliveries and smart procurement.
- Subcontractors and suppliers are supported in adopting measures that reduce fuel consumption and unnecessary trips.

Site management will provide subcontractors with information on public transport timetables and agreed delivery routes. Car sharing will be encouraged where practicable. A mandatory delivery booking-in system will be used to minimise disruption to the public and avoid peak traffic periods. All information related to deliveries and logistics will be maintained within the CLP

## **4.3 Construction Site Security**

Perimeter security will be established using Heras fencing installed around the site boundary, rather than solid hoarding. Where visual screening or additional privacy is required, closeboard fencing will be installed in the relevant locations. The main site entrance will consist of metal gate posts with Heras gate panels, providing secure, controlled access to the construction area.

Banksmen/traffic marshals will assist HGVs and other delivery vehicles when entering and exiting the site, ensuring safe vehicle movements and maintaining the security of the access point.

Only authorised personnel will be permitted onto the site. All visitors must enter through the designated main entrance and report to the Construction Manager/Site Manager. Visitors will be required to sign in, receive an induction where applicable, and remain accompanied throughout their time on site in accordance with the site's security and safety procedures

All visitors will be required to sign in and out to ensure that Site management are aware of the number of people on-site in the event of an emergency.

Visitors will be required to undergo induction training, wear the necessary PPE i.e. safety helmet, hi-visibility attire, safety footwear and will be accompanied by a representative on site at all times.

The hoarding and all storage areas will be checked on a daily basis to ensure that it is maintained in good condition and remains secure.

All entrance and exit gates into the Site will be secure at all times.

All mobile plant/equipment will be parked safely and locked within a designated area to prevent tampering, and keys to all plant/equipment will be kept in a secured location.

#### 4.4 Traffic and Plant Management

Barratt Redrow Southern Counties will produce a Traffic Management Plan which will be in place as part of the site set up. To ensure that the targets set out in the plan are met, Barratt Redrow Southern Counties will have a trained traffic marshal/banksman/signaller on site to direct and monitor delivery to site.

Plant such as excavators, dumpers, telescopic forklifts and associated construction equipment will be used on site. Exact quantities will be confirmed by the Principal Contractor as part of the Traffic Management Plan.

The following traffic and plant management checks will also be implemented;

- Delivery vehicles whenever practical will avoid 'peak public traffic hours' to reduce traffic congestion and nuisance to the existing road and highway network.
- To avoid construction traffic congestion and nuisance to the surrounding area, all suppliers and contractors will be made aware of traffic routes.
- Site entrances will be maintained and kept clean and clear. There will be a road sweeper in operation when required and in line with the works activities to ensure no mud is left on the public footpath and access roads.
- All materials will be loaded within the site compound as shown on the Site set up plan to minimise congestion.
- For environmental and road safety all material containers leaving site will be appropriately covered to avoid soiling of the roads and public path.
- Engines of all vehicles, mobile and fixed plant on site are not left running unnecessarily. · Using low emission vehicles and plant fitted with catalysts, diesel particulate filters or similar devices.
- Use of low sulphur fuels in plant and vehicles will be recommended where possible. · All plants used on site will be well maintained, with routine servicing of plant to be completed in accordance with the manufacturer's recommendations and records maintained for the work undertaken.
- All project vehicles, including off-road vehicles, will hold current MOT certificates, where applicable and where required due to the age of the vehicle and that they will comply with exhaust emission regulations for their class.
- Wheel washing facilities will also be on site to avoid mud being transported onto the local road network.

#### 4.5 Construction Noise

Barratt Redrow Southern Counties are aware that the site is located in a residential area and as such subcontractors will be made aware of the sensitive receptors and the requirement to use the correct tools during work.

The potential noise sources from work undertaken in connection with this project may include:

- Earthworks
- Excavations
- Transportation
- Cleaning
- Construction
- Waste Management

The site team will implement the necessary management and operational controls in order to minimise any adverse impacts on the local community from construction activities

Work hours will be as per those stated within the approved planning permission. Work and noise outside of these agreed hours is strictly prohibited without prior agreement of Barratts and the Local Planning Authority.

Contractors will ensure the implementation of best practicable means to reduce noise levels and to ensure compliance with acceptable levels. The best practicable means for reducing noise will also be discussed during site induction and also carried out during toolbox talks.

Where there is a noise or vibration issue from site, the Site team will review the subcontractor's method statement and identify as reasonably practicable strategies to control noise at source.

The maximum level of vibration level at construction sites will be required to meet the criterion set out in BS 5228-1 (noise) and BS 5228-2 (vibration).

Vibration risks are expected to be low; however monitoring will be undertaken where triggers occur during the course of the project, if any complaint from the neighbours or other sensitive receptors will be investigated.

Monitoring of noise and vibration will be undertaken when:

- Agreed levels are likely to be exceeded
- Upon receipt of substantiated complainants
- At the request of the Local Planning Authority following any substantiated complaints

The site team will implement the following checks to ensure that noise is kept to a minimum;

- Plant not in continual operational use will be switched off and noise suppression covers will be used where practicable.
- Vehicle noise will be kept to a minimum. (e.g. excessive revving of vehicles will not be permitted)
- Where possible noisy plant and equipment will be sited away from sensitive noise boundaries.
- Where reasonably practicable, fixed items of construction plant should be electrically powered in preference to diesel or petrol driven.
- Where this is not possible, noise emission will be controlled accordingly following a risk assessment.
- Loading and unloading of vehicles, dismantling of site equipment, such as scaffolding, will be conducted in such a manner that noise generation is kept to a minimum. Reversing alarms will be set to the minimum required setting by the HSE, and consideration given to the use of alternative types of alarm, e.g. White noise that has less potential for annoyance.

#### 4.6 Construction Waste

The *Site Waste Management Plans Regulations 2008*, which formerly required construction projects over £300,000 to prepare a Site Waste Management Plan, were revoked on 1 December 2013. Although no longer a legal requirement, maintaining structured waste management procedures remains good practice and supports compliance with current environmental legislation.

Barratt Redrow Southern Counties will take all reasonable steps to ensure that:

- a) All waste arising from the site is managed in full accordance with the Section 34 Duty of Care under the *Environmental Protection Act 1990* and the Waste Duty of Care Code of Practice, including requirements to prevent unauthorised or harmful disposal, prevent escape of waste, and ensure waste is transferred only to authorised carriers with accurate documentation.
- b) Materials are handled efficiently and waste is minimised through good planning, segregation, correct storage, and appropriate reuse and recycling practices.

The waste hierarchy, as required under the Duty of Care, will be implemented on site as follows:

- Prevention / Reduction: Careful design, procurement and material management will minimise waste generation.
- Re-use: Products and materials will be reused on site or sent for reuse wherever practicable.
- Recycling and Composting: Materials will be segregated and sent to appropriately licensed recycling or recovery facilities.
- Disposal: Only where no viable prevention, reuse, recycling or recovery option exists will waste be sent for disposal.

These measures ensure legal compliance and promote sustainable resource use in line with recognised national best practice.

**Waste Segregation:**

Wherever possible, different types of waste should be segregated as they are produced to allow for correct disposal. The site team will review the logistics and also puts checks to prevent pollution and cross contamination of waste on site.

#### 4.7 Air Quality and Dust Management from Construction Activities

The PC shall implement dust controls proportionate to the risk, with reference to IAQM guidance where applicable. As a minimum, the following controls shall be implemented:

- Maintain clean access/egress points and keep public roads/footways free from mud and debris (wheel-wash and road sweeping as required).
- Sheet or cover vehicles transporting loose materials and avoid overfilling.
- Dampen down haul routes, stockpiles and cutting/grinding activities where dust is likely.
- Minimise drop heights during loading/unloading and avoid uncontrolled tipping.
- Store powders/cement and other dust-generating materials in sealed containers or enclosed areas.
- Position high dust activities away from sensitive receptors where practicable and manage on-site routing.
- Suspend or modify activities during high winds where dust cannot be adequately controlled.

Where complaints are received, visible dust is observed beyond the site boundary, or the LPA requests additional assurance, the PC shall review controls and implement additional measures and/or monitoring.

**Respirable Crystalline Silica (Occupational Health Note)**

Controls for respirable crystalline silica (RCS) exposure (including LEV, wet cutting, RPE and face-fit testing) shall be addressed within the Construction Phase Plan and task-specific RAMS. This CEMP focuses on environmental dust controls and nuisance prevention.

#### 4.8 Emissions from Vehicles

A Construction Logistics Plan has been produced for this site and the aim is to ensure smart delivery management and smart procurement of materials for this project. This strategy will be enforced during the tender stage by the BDW Commercial team for subcontractors who intend to work on this project.

As part of the CLP and procurement targets, subcontractors will be encouraged so far as reasonably practicable to prefabricate materials off site prior to delivery to site.

This strategy will minimise multiple deliveries, reduce emissions from the vehicles and maintain the neighbourhood air quality.

#### 4.9 Emissions from Construction activities on site

Barratt Redrow Southern Counties also understands the requirement of reducing emissions of dust, PM10 from construction and demolition.

Some of the proposed checks and strategies to control emissions include the following;

- a. Site Management will endeavour to locate machinery and dust generating activities away from receptors.
- b. Subcontractors will be encouraged as far as is reasonably practicable to prefabricate material off site prior to delivery to site.
- c. Smart procurement will minimise multiple deliveries, reduce emissions from vehicle and maintain the neighbourhood air quality.
- d. Site management will endeavour to minimise cutting, grinding and sawing on site.
- e. Where such activities must take place subcontractors will be required to spray water preferably from a water efficient spray pump over the material as it is being cut. This will reduce the amount of dust generated.
- f. Site Management will check that cement, sand, fine aggregates and other fine powders are sealed after use.
- g. Mud and debris will be cleaned as they become dust once they dry out.
- h. For all activities involving release of silica dust and persons carrying out sweeping activities, all personnel will be expected to be face fit tested and wear a suitable Face Fit P3 mask.

Site transport that creates substantial amounts of dust must ensure the following;

- Hierarchy of prevention is implemented:
- Adequate ventilation provided, or
- Water Suppression System used, or
- Local Ventilation Systems (vacuum) systems used

Where the above hierarchy cannot be implemented, those exposed to the dust must wear Respiratory Protection Equipment (RPE) – Select RPE via HSG53 principles; minimum APF 20 for RCS tasks unless assessment requires higher.

To ensure that the Construction Logistics Plan strategies set out with respect to reducing emissions from subcontractor deliveries to site, the delivery check sheet will be reviewed (quarterly) during progress meetings

### **Surface Water, Silt and Concrete Washout**

The PC shall prevent silt, cementitious materials and contaminated water from entering drainage systems, watercourses or groundwater. The following minimum measures shall be implemented:

- Identify site drainage features and protect gullies/drains during earthworks and wet weather.
- Use silt fencing, straw bales, sediment traps, settlement measures or other controls where runoff could mobilise silt.
- Stabilise haul routes and stockpiles to reduce tracking and runoff; cover stockpiles where appropriate.
- Establish a designated concrete washout area and prohibit washout to ground or drainage.
- Implement a wet-weather working approach: increase inspections following rainfall; pause or modify high-risk activities where controls are ineffective.

## 5. Environmental Management and Monitoring

| Environmental Aspect    | Risk / Impact                                     | Minimum Control Measures (to be implemented)                                                                                                                                                                        | Responsibility       | Monitoring / Records                                                       |
|-------------------------|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------------------------------------------------------|
| Dust / soiling          | Nuisance to neighbours; soiling of roads/footways | Water suppression as required; sheeting of vehicles; cover stockpiles; minimise drop heights; damp down cutting/grinding; rapid clean-up of spillages; road sweeping; wheel-wash where required                     | Principal Contractor | Daily housekeeping checks; weekly environmental inspection; complaints log |
| Air quality / emissions | Plant and vehicle exhaust emissions               | No idling policy; maintain plant; use lower-emission plant where practicable; consolidate deliveries; agreed HGV routes; avoid school peak delivery times                                                           | Principal Contractor | Delivery booking logs; toolbox talks; inspection records                   |
| Noise                   | Nuisance; potential disturbance to receptors      | Comply with working hours; best practicable means; select quieter equipment; maintain plant; locate noisy activities away from receptors where practicable; manage reversing alarms; respond to complaints promptly | Principal Contractor | Weekly inspections; complaints log; monitoring if triggered                |
| Vibration               | Nuisance and potential building                   | Plan high-vibration activities; avoid                                                                                                                                                                               | Principal Contractor | Method statements; monitoring results if                                   |

|                                  |                                                |                                                                                                                                                                         |                      |                                                              |
|----------------------------------|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------|
|                                  | disturbance                                    | unnecessary percussive methods; monitor if required by methodology or complaints/LPA request                                                                            |                      | undertaken; complaints log                                   |
| <b>Surface water / siltation</b> | Silt-laden runoff to drains/watercourses       | Protect gullies/drains; maintain clean haul routes; silt fencing / sediment controls where needed; stabilise stockpiles; avoid uncontrolled discharge; wet-weather plan | Principal Contractor | Inspection after rainfall; weekly inspections; photo records |
| <b>Concrete washout / cement</b> | High pH pollution to ground/drains             | Designated washout area; no washout to drains/ground; store cement securely; spill kits available; train workforce                                                      | Principal Contractor | Site inspection records; incident log                        |
| <b>Oils / fuels / chemicals</b>  | Ground and water pollution; fire risk          | Bunded storage; drip trays; lockable tanks; refuel in designated area; spill kits; trained staff; immediate containment and reporting of spills                         | Principal Contractor | Weekly checks; storage inspection logs; incident records     |
| <b>Waste</b>                     | Environmental harm; illegal disposal; nuisance | Apply waste hierarchy; segregate waste; licensed carriers only; WTN maintained; prevent windblown litter; secure skips                                                  | Principal Contractor | WTNs; waste logs; housekeeping inspections                   |
| <b>Materials storage</b>         | Contamination; nuisance; visual impact         | Store within compound; keep away from RPAs; secure light materials; label and segregate hazardous                                                                       | Principal Contractor | Weekly inspections; COSHH storage checks                     |

|                            |                                       |                                                                                                                        |                      |                                                                          |
|----------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------|
|                            |                                       | materials                                                                                                              |                      |                                                                          |
| <b>Traffic / logistics</b> | Road safety, congestion, mud on roads | CLP/CTMP in place; delivery booking; banksman; no highway unloading; wheel-wash and road sweeper; clear signage        | Principal Contractor | Delivery logs; daily checks; highway condition checks as agreed          |
| <b>Ecology / trees</b>     | Damage to retained trees/habitats     | Protection fencing; no storage in RPAs; toolbox talks; follow AMS/TPP; stop work and escalate if constraints breached  | Principal Contractor | Weekly inspections; photo evidence; arboriculturist checks (if required) |
| <b>Community liaison</b>   | Complaints; reputational impacts      | Information board; contact details; advance notices for disruptive works; prompt complaint investigation and close-out | Principal Contractor | Complaints log; communications record                                    |

Site investigation works completed onsite cannot provide complete certainty across all areas of the site as to the exact ground conditions per square metre of the site.

There are various scenarios that may be encountered during excavation, such as the identification of a former underground storage tank or other underground structure, identification of discoloured soils, a localised but significant change in the type of material encountered and/or detection of unusual or “chemical” odours in the soils,

If any of the above situations arise, or any other unexpected scenario with regards to the potential for contamination, the following Method Statement will need to be followed:

## Method Statement

There is the possibility that sources of contamination may be present on the site that was previously unforeseen. In the event of identification of such conditions, this method statement should be followed by the Contractors:

- Should such contamination be identified or suspected during the site clearance or ground works, these should be dealt with accordingly (stop work, make safe, notify, assess, agree remediation).
- Any Employee of the Principal Contractor, or a subcontractor who discovers an area of ‘contaminated land’ or comes across ‘polluted’ ground water, during the course of construction will report the matter immediately to the Site Manager, or in his absence, the most senior member of staff at the site.

- The Site Manager will inform Fulkers Bailey Russell, at the earliest opportunity, and in the meantime instruct staff to stop works in the specific area.
- A member of staff from Fulkers Bailey Russell will inspect the site and carry out/or arrange for an appropriate risk assessment to take place.
- The matter will be recorded, and reported to Groundwork consultants in the first instance, then the Local Authority and/or the Environment Agency.
- Samples will be taken if required to determine the contamination levels and to determine classification of the waste.
- Where the waste is removed from site, it will be transported to an appropriate landfill site, and detailed logs recorded.
- Work will only re-commence in the affected area when FBR have informed the Site Manager that the matter is completed, (guidance, where appropriate, will be obtained from the appointed consultant, the Local Authority and/or the Environment Agency, should a change in the methodology be required).
- Details of the incident, the assessment, and remedial action taken will be logged by the appointed consultant and added to the Health and Safety File on site.

### 5.1 Piling and Foundations

This information will be updated following completion of field investigation works.

### 5.2 Pollution, Prevention and Hazardous Material Storage

Chemicals and hazardous materials such as fuels and lubricants may be stored on site during the construction phase. These may include, but are not limited to:

- Fuels
- Oils
- Lubricants
- Paint and Coating
- Adhesives and resins
- Solvents
- Compressed gases
- Cements and binders

All pollution control measures implemented on this project will comply with:

Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016) governing water discharge and groundwater activities.

Environmental Protection Act 1990 – Section 34 Duty of Care for the safe management of waste.

Control of Pollution (Oil Storage) (England) Regulations 2001, which remain in force and set legally binding requirements for oil storage.

Any activities with potential to cause a water discharge or groundwater activity will only be undertaken where covered by an appropriate environmental permit or exemption.

Although the former Pollution Prevention Guidelines (PPGs) have been withdrawn by the Environment

Agency, selected documents (e.g., PPG2, PPG3, PPG7, PPG13, PPG26) continue to represent recognised good practice and may be used as supplementary guidance where appropriate. Current regulatory requirements for England are instead taken from up-to-date GOV.UK guidance.

### **Pollution Prevention Measures**

The following measures will be established, implemented and maintained on site to prevent pollution:

- Hazardous materials will be handled, used and stored in accordance with current Environment Agency guidance, including the GOV.UK “Oil Storage Regulations for Businesses”.
- Fuel, oil, and chemical storage areas will be bunded and secure, with impervious bases and a capacity of:
  - 110% of the largest container, or
  - 25% of the total stored volume, whichever is greater.
- Drip trays will be used under diesel pumps and static plant to capture minor leaks.
- Spill kits (absorbent granules, pads, booms) will be available at all fuel and chemical storage areas, and operatives will receive training in spill response.
- Oil interceptors will be installed where required for any temporary discharge points associated with refuelling or plant storage areas.
- Pollution control procedures will be included in site inductions and environmental toolbox talks.
- All hazardous waste will be segregated, labelled, securely stored, and managed in accordance with the EPA 1990 Duty of Care and the Waste Duty of Care Code of Practice (DEFRA/EA).

The Environment Agency Incident Hotline (for reporting pollution events) is: 0800 807060.

### **Fuel and Oil Storage Requirements**

All fuel and oil storage will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 and current Environment Agency guidance. Measures include:

- Fuel and oil tanks will be locked when not in use.
- Storage areas will be located at least 10m away from watercourses, drainage ditches, and highway gullies.
- Mobile bowsers will be bunded, locked, labelled, and placed on level, secure ground.
- Drums and IBCs will be stored in bunded areas and kept in good condition with lids secured.
- Only trained operatives will carry out refuelling of plant and machinery.
- Static combustion engine plant (e.g., generators, compressors, lighting towers) will be integrally bunded or placed on drip trays.
- All plant will undergo regular inspection and preventative maintenance checks to identify and repair leaks.
- Spill response equipment will be strategically positioned and maintained, with all staff briefed on emergency procedures.

## 6. Communication and Neighbourhood Liaison

### 6.1 Neighbourhood Liaison

The PC shall minimise disturbance to the local community and maintain effective communication throughout the works. As a minimum:

- A site information board shall be displayed at the site entrance and shall include: project title, working hours, PC contact name/number/email, emergency contact arrangements, and details for how complaints can be raised [see Appendix 1].
- Residents and local stakeholders shall be provided with advance notification of disruptive activities (e.g., high noise works, significant deliveries, temporary traffic management) where practicable.
- A complaints log shall be maintained and shall record: date/time, complainant details (if provided), issue raised, actions taken, and close-out confirmation.
- Complaints shall be acknowledged promptly and investigated by the Site Manager. Corrective actions shall be implemented where required and recorded.

Where repeated or substantiated complaints occur, or where requested by the LPA, the PC shall review and enhance controls and provide evidence of corrective actions and monitoring results as appropriate.

### 6.2 Good Practice in Site Conduct and Community Consideration

Although the site will **not** be registered with the Considerate Constructors Scheme, the Principal Contractor will adopt **general good practice principles** to ensure the site is managed professionally, safely, and with due regard for the surrounding community and environment. These expectations include:

#### Professional Site Appearance

- Maintaining a clean, tidy, and well-organised site.
- Presenting site facilities, signage, and welfare areas to a high standard.
- Ensuring the workforce presents a professional image at all times.

#### Respect for the Local Community

- Communicating courteously with neighbours and stakeholders who may be affected by the works.
- Managing deliveries, parking, and highway use to minimise disruption.
- Taking reasonable steps to support a positive relationship with the local community.

#### Environmental Responsibility

- Identifying and managing potential environmental impacts.
- Minimising waste, emissions, noise, vibration, and light pollution where practicable.
- Protecting ecology, landscape features, watercourses and vegetation in line with approved documents and the CEMP.

#### Safety for All

- Maintaining robust systems for the safety of the public, visitors, and the workforce.

- Minimising security risks to neighbouring land and the general public.
- Encouraging continuous improvement in safety practices and behaviours.

#### A Supportive Working Environment

- Providing welfare facilities that meet required standards.
- Treating all personnel fairly and respectfully.
- Supporting health, wellbeing, and opportunities for development where possible.

These general principles reflect recognised industry expectations for responsible construction management **but do not constitute registration with, or formal adoption of, the Considerate Constructors Scheme.**

### 6.3 Communication

Effective communication of the environmental controls set out and construction safe practices is deemed a requirement for the successful management of this project.

To ensure the above is achieved, the CEMP will be distributed to the project team, including sub-contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations will also be briefed to staff and Contractors.

The Contractor will define procedures for internal and external communication. The client may require that any communication with external parties such as environmental regulators or the public is undertaken through a nominated client representative.

The agreed CEMP will be published on the project website.

During the construction phase, internal communication will include regular progress meetings, which should cover:

- Training undertaken
- Progress reports
- Inspections, audits and non-conformance
- Complaints received
- Visits by external bodies and the outcome or feedback from such visits
- Objective / target achievement, including reporting on environmental performance.

External communication may include letter drops or meetings, and liaison with statutory authorities.

### 6.4 Complaints and Non-Conformances

A formal complaints procedure will be developed and the procedure will include the following;

- Date of the complaint
- Time
- Nature of the complaint- All complaints are put into one of the following categories: Noise, Dirt and Dust. Parking, Safety, Inconsiderate Behaviour, Road Conditions and Vehicle Movements, Environmental Concerns, Pedestrian Access Obstruction, Property Damage, Site Lighting, Working Hours and Other.
- Actions or investigation carried out with updates
- Communication updates with the complainant

The project manager and site management will be the first point of contact with respect to any complaint and will carry out all investigations and respond to external complaints.

## 7. Monitoring and CEMP Review

Environmental controls shall be verified through routine inspection and responsive checks following trigger events. The PC shall implement the following minimum monitoring arrangements:

- Daily: site housekeeping checks (roads/footways cleanliness, waste segregation, storage, spill kits, dust suppression readiness).
- Weekly: formal environmental inspection (recorded) covering dust, noise nuisance controls, waste, drainage protection, storage and signage.
- After trigger events: additional inspections following heavy rainfall, high winds, incidents/spills, major deliveries, changes in methodology, or complaints.

Records shall be retained on site and made available upon request. Records shall include (as applicable): inspection forms, toolbox talks, delivery booking logs, waste transfer notes, spill/incident logs, photo evidence of controls, and complaints records.

This CEMP shall be reviewed at key milestones and updated where necessary to reflect programme, methodology, stakeholder requirements, or planning conditions.

### **CEMP Review**

The CEMP is a live document and the project team on site will ensure that controls outlined in the CEMP are properly implemented and regularly monitored to ensure their effectiveness.

Changes to the controls will be instigated if they are not achieving their objectives.

The CEMP will be revised once new changes have been implemented to address the environmental controls set out. The aim is to ensure control set out remains consistent with environmental regulatory requirements and also meet conditions of planning approval.

### **Environmental monitoring**

Scheduled monitoring of environmental performance will be conducted during the course of the development. This will enable the overall effectiveness of established environmental measures and compliance procedures to be assessed, and allow areas of underperformance to be identified so corrective actions can be taken to strengthen environmental safeguards or improve outcomes.

### **Safety Inspections**

Regular inspections will be carried out on all construction activities and work areas in order to check compliance with this CEMP and regulatory conditions. The results of these inspections shall be recorded as part of the Health and safety auditing procedure.

### **Event Based Inspections**

Event based checks shall be conducted by the Project Manager following any significant event such as rainfall of sufficient quantity to generate run off, high winds, the receipt of an environmental complaint, issue of a non-compliance report or any exceedance in monitoring results. Event based checks will be recorded on a separate inspection form detailing the reasons, observations, findings and outcomes of the inspection which should then be recorded and actions closed out.

### **Performance and Progress meeting**

A regular progress meeting will be held with the stakeholders and the subcontractors to discuss the construction updates and check that controls are effective.

## 8. References

**PPGs withdrawn** / use GOV.UK guidance & optional GPP best practice: GOV.UK withdrawal notice; NetRegs GPP overview.

**Oil storage guidance (current)**: GOV.UK EA/DEFRA “Oil storage regulations for businesses” & overview pages.

**Waste duty of care** (EPA s34) & Code of Practice (2018): GOV.UK & DEFRA/EA Code PDF.

**SWMP Regulations revoked**: Legislation.gov.uk, sector round-ups.

**Water pollution offences now under EPR 2016**: EPR 2016; legal commentary. (WRA s85 remains.)

**BS 5228-1/-2 (current)**: BSI references confirming **2009+A1:2014** editions.

**IAQM Construction Dust Guidance (2024 v2.2)**: IAQM guidance page.

**CLOCS Standard v5**: CLOCS update & effective date.

**HSE silica (RCS) overview / RPE**: HSE INDG463; APF context from industry/HSE material.

Appendix 1

SITE NAME

THINK SAFETY FIRST ON SITE

ALL DRIVERS AND VISITORS MUST REPORT TO THE SITE OFFICE AND SIGN IN







10

SITE SPEED LIMIT

  
AED  
Emergency defibrillator

LOCATED IN SITE OFFICE DURING SITE WORKING HOURS

  
CONSTRUCTION WORKS IN PROGRESS

  
NO ACCESS FOR UNAUTHORISED PERSONS

EMERGENCY CONTACT NO

XXXXXXXXXX

 REDROW

Keeping People Safe 

**Raising the bar for construction  
consultancy services.**