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1.0 Scope

This Construction Environmental Management Plan (CEMP) has been formulated to support the planning submission in association with the construction of 5 small scale business units within the Alloy Industrial Estate, Pontardawe.

The following plan is a qualified assessment based on current information and is subject to refinement as the project evolves. We have prepared our plan to outline how this project will be constructed including a review of the construction methodology, site logistics and environmental measures to be undertaken. This report also describes the proposed outline programme and key activities for the construction works. Potentially significant environmental impacts associated with these activities are identified and where necessary, proposals for mitigation are outlined.

Planning for the construction is necessarily broad at this stage and may be subject to modifications during detailed construction planning. Consequently, a number of aspects of construction in relation to environmental issues cannot, at this stage, be accurately predicted. For examples, the number of vehicles required during site works will be dependent on the progress of the works against the construction program.

This document provides details all necessary pollution prevention measures for the construction phase of the development of the procedures to be followed in the event of a pollution incident and sets out a procedure for recording and reporting of such incidents, should they occur.

The procedure also sets out the requirement for the establishment of Pollution Incident Control Teams where the size, complexity or the environmental risks identified at Construction Phase dictates.

2.0 Background

The project consists of the development of 5 small scale industrial units. The area and surrounding area provides industrial activities. The proposed site is located within an existing secure compound.

The purpose of document is to ensure that the site contractor develops and implements a CEMP to help ensure that construction activities are planned and managed in accordance with the environmental requirements of the project.

Construction activities in general have the potential to impact on the environment. They have an interface within existing infrastructure, industry and commercial zones, domestic housing and settlements. There are no watercourses located on the site.

Other sensitive receptors will be identified prior to and during the construction works. A list of sensitive receptors will be prepared and maintained by the Environmental Representatives of the construction teams. This will form the basis of any risk assessment for environmental issues for works in or adjacent to these areas. Such receptors may include housing, roads (in terms of dust), water bodies and other receptors potentially at risk from the effects of construction activities.

The objectives of the method statement are to:

- Prevent Pollution during the Construction Phase of the development;
- Ensure a safe place of work;

- Establish the criteria for Safe Systems of Work;
- Provide Protection of staff and the environment from potential exposure to harmful materials;
- To provide protection of environment from contamination;
- To enable the construction operation to be completed on time and to the required standard;

All works will be carried out to comply to all statutory health, safety and environmental legislation including: the Health and Safety at Work Act 1974, the Construction Design and Management Regulations 2015, The Construction Health Safety and Welfare Regulations 1996, The Special Waste Regulations 1996 and all Duty of Care legislation.

3.0 Site Parameters

Before commencing works the Site Manager will ensure that all correct Construction Procedures are being followed and that all relevant information is available, including:

- All drawings are available e.g. Setting Out and Service Drawings
- All Services have been located and marked out. (Services to be located by hand digging)
- Permit to Dig system is being adhered to
- The contents of this Method Statement have been discussed with operatives carrying out the works and a record signature obtained

Relevant Contractual & Legal References

- Collection & Disposal of Waste Regulations 1988 (amended 1989)
- The Waste (England & Wales) Regulations 2011
- Controlled Waste (England & Wales) Regulations 2012
- Site Waste Management Plans Regulations 2008
- Hazardous Waste (England and Wales) Regulations 2005
- The Environmental protection Act 1990

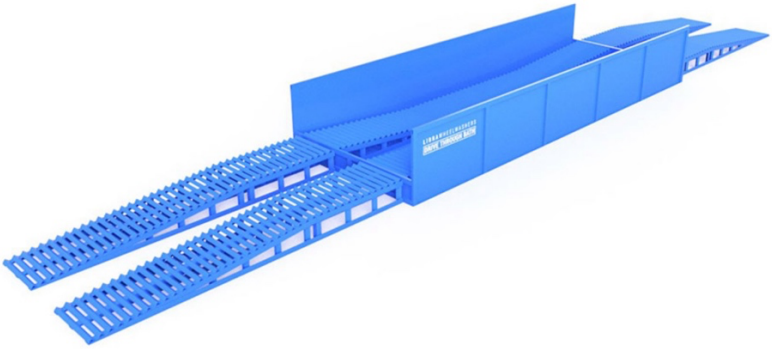
4.0 Planning and Implementation

Dust Emissions
Construction activity can result in temporary impacts from dust if unmanaged. Dust emissions arising from the construction are a potential physical impact, giving rise to nuisance, soiling of vegetation.

- Dust observational monitoring will be carried out throughout the duration of the works and will be
- controlled as listed below:
- All hard surfaced roads will be wet swept in dry weather conditions.
- Water bowsers will be employed on all un-made road surfaces in periods of dry weather.
- A maximum speed limit of 10mph will be observed on the site access/haul road. 10 mph signs will be posted at suitable location.
- The loading of road vehicles shall be in such a manner as to minimise the generation of fugitive dust and, when appropriate, these wagons shall be sheeted.

Protection of Public Highway
No vehicle will leave the site and enter the public highway network until it has been cleaned of any spoil or debris. The gateman at the main entrance will control all access and egress to/

from site. Part of the gateman's role will be the checking of vehicles for spoil or debris prior to leaving site.



Typical image of eurowash drive through bath wheel wash (to be located at egress point to the site)

Surface-water and Ground-water Pollution Prevention
The removal of established vegetative cover can lead to the loss of large quantities of soil particles and suspended silt to watercourses which can then cause significant pollution of water. Therefore, any earth moving works or other similar operations giving rise to contaminated drainage must be carried out in accordance with BSI Code of Practice for Earth Works, BS6031: 2009.

The main water risks during the proposed construction phase of the development are anticipated to be related to the production of silty water during rainfall events or a chemical spillage adversely discharging into the existing surface water drainage network or through infiltration into the ground.

Site drainage and surface run-off contaminated with silt will not be allowed to directly enter the adjacent watercourse., surface water drainage system; as such, appropriate sedimentation and silt mitigation measures will be implemented on site in order to treat contaminated waters. This will include the use of Terrastop Premium Silt Fence or similar being installed to the North Western boundary within the grounds of the construction site. This barrier is a special, high quality, permeable, technical filter fabric for stormwater surface runoff pollution management. The barrier can be installed as an entrenched vertical entrapment fence, and is designed to intercept and detain stormwater run-off, trapping harmful silt through settlement and filtration before it leaves the site.

Typical image of Terrastop Premium Silt Fence

Refuelling
An area will be designated for refuelling on site. All bowsers will be bunded capable of holding 110% of the contents of the tank. A drip will be used for all refuelling with a suitable spill kit and granules positioned at the refuelling area. All operatives subject to refuelling duties will receive a toolbox talk on refuelling and the protocol in the event of a spillage. All operatives assigned to refuelling will receive training in the use of a spill kit.

For the refuelling of small items of plant at remote areas of the site a drip tray will be used.

Waste Compound
A hard standing areas will be designated for the waste compound. The area will be segregated from the main works by heras fence with segregated skips for different waste streams. The on-site procedures regarding the segregation and disposal of waste will be communicated during the site induction. A COSHH bin with a sealed lid will be provided in the waste compound for the disposal of COSHH items. The management and segregation of waste will be managed by the site foreman on site to prevent the buildup of waste around the site and that waste is being designated to the correct skip. Tipping skips will be provided at designated areas around the site for the forklift driver to transport to the waste compound.

In addition to the above, the principals of Reduce, Reuse, Recycle will also be implemented throughout the construction project.

5.0 Pollution Incidents Categorisation and Definitions
All pollution incidents must be managed and reported in accordance with the procedure.

In order to be able to report appropriately on a pollution incident, the following definitions will be applied.

Pollution incidents are designated as "Major" and "Minor". The classification of an incident as "Major" or "Minor" where "significant environmental damage" has been caused is subject to the reporting procedure and will be determined by the Site Operations Manager and, as appropriate, environmental specialists.

In the event of a major environmental incident works will stop in the affected area until relevant controls have been implemented to ensure compliance or to prevent further environmental damage. The procedure below (*Table 1.0)* will be followed and include Instructions for all Site Staff in the event of a Pollution Incident" will be followed.

An incident that has occurred due to a failure in management systems and which has caused significant environmental damage.
An incident in breach of legal requirements (i.e. a breach of a legal consent or dispensation or causing a statutory nuisance).
An activity which does not comply with environmental procedures and gives rise to significant environmental pollution, contamination or harm.
An activity identified as a breach of best practical means as set out in the relevant Section 61 Consent.
Working outside of consented working hours, as defined within the Section 61 Consents, without having notified the relevant EHO of the offence.

Environmental non-compliance with the Specialist Environmental Procedures will also be categorised and reported as a "pollution incident".

In addition to the classification of pollution incidents, "environmental damage" and "emergency" are defined as follows:

- Environmental damage – emissions to air (which for the purpose of this procedure includes noise), water and land which exceed specified levels of environmental legislation and standards and/or impact to a protected species or habitat; and
- Emergency – an event or series of events that are uncontrollable and which require assistance from external agencies.

An incident which has occurred due to a failure in management systems.
An incident which has potential to cause environmental damage.
An activity which does not comply with environmental procedures.
A major environmental incident that was normally avoided.
The use of an item of equipment which is considered to be neither best practice nor operating in accordance with best practicable means.

	Action	Responsibility
1	Immediately stop work on site. Take appropriate safe actions to prevent further pollution occurring	Personnel present at the incident site
2	Notify Environmental Representative/Foreman/Team Leader of incident, possible environmental impact and effect on works	Senior staff member at the incident site
3	Notify Ste Operations Manager, Pollution Incident Control Team and Site Safety Officer	Environmental Representative
4	Identify nearby sensitive receptors and take appropriate safe actions to prevent migration of pollutants	Environmental Representative / Incident Control Team
5	Monitor areas for further contamination/migration of pollutants	Environmental Representative
6	Agree and implement remediation techniques (prepare method statements if required)	Senior staff members at the incident site
7	Complete Pollution Incident Control report. Senior staff member to provide instruction to re-start works on remediation of the incident	Senior staff member at the incident site

Table 1.0

6.0 Minor Spillages – roles and responsibilities

General Roles and Responsibilities

The roles of the pollution incident control teams are described in the following section.

The Site Safety Officer will maintain a register of all spillage, how it occurred, how it was cleared and how the contaminated material was disposed of.

Pollution Incident Control Teams

In the event of a pollution incident occurring on site, trained emergency pollution incident control teams will be called upon to implement immediate remediation works.

The Site Safety Operator will be responsible for appointing Pollution Incident Control Team members for their section of the works.

A register of the Pollution Incident Control Teams will be developed by the construction team and maintained on site. The register will contain:

- Details of the names and roles of the Pollution Incident Control Team members and their contact telephone numbers;
- Names and contact telephone numbers of external parties; and
- Details of the locations of spill kit equipment will also be included

In addition to the information held onsite, emergency contacts and telephone numbers will be provided below (to be developed further upon contractor appointment):

Position	Name	Contact Number
Ambulance – Fire & Rescue - Police	Emergency Services	999
Site Operations Manager	TBC	TBC
Site Safety Adviser	TBC	TBC
Site Office First Aid Attendant	TBC	TBC
Local Accident & Emergency Hospital	Morriston Hospital Heol Maes Eglwys Morriston Swansea SA6 6NL	01792 702222
NRW Hotline	24 Hour Emergency	0800 807060
Health & Safety Executive	Ty Myrddin Old Station road Carmarthen Dyfed SA31 1LP	01267 223267
Neath Port Talbot County Borough Council – Environmental Health Officer – Pollution Control	The Quays Brunel Way, Briton Ferry Neath SA11 2GG	01639 686949

Inspection Procedures

In order to maintain controls on pollution control, the Pollution Incident Control Team members and / or site supervision will undertake weekly inspections of the areas where there is a pollution risk and where control measures are in place, as part of the Site weekly inspections.

Activities to be addressed & Control Procedures

On discovery of an environmental/pollution incident the procedures detailed in Table 1.0 will be followed. It should be noted that the detailed control and remediation of the pollution incident will depend upon its severity.

Monitoring, Auditing and Reporting

Monitoring will be undertaken via monthly audits, performed by the site Safety Officer, and by weekly H&S inspections undertaken by site supervision / management.

Full auditing will be undertaken with the Site Safety Officer responsible for maintaining records of all pollution incidents within the team. Reporting of major and minor incidents will be undertaken on the appropriate proforma.

Major environmental incidents will be recorded on "Environmental Incident Notification Report" proforma and by using the system Defect Reporting procedure. These forms will be copied and filed at the site, as environmental incidents.

The Site Operations Manager (SOM) will be immediately notified verbally, of a major incident occurring and an incident report form will be completed and copied to the SOM as soon as is practicable but no longer than 24 hours following the incident.

All minor environmental incidents must be reported to the SOM. The completed forms will be copied to the Site Manager within 48 hours of the incident. The SOM will maintain a record of all major incidents. These will be reviewed monthly to continually improve on the environmental management systems in operation on site.

Training requirements

Specific training for Pollution Incident Control Teams will be provided prior to the commencement of major construction works on site. This will include:

- familiarisation with the Pollution Incident Control Plan;
- procedures to be followed in the event of a spillage;
- specialist training on the use of spillage control materials will be provided for the pollution incident
- control team(s) by the equipment manufacturers;
- training on the disposal of spent spill-kit products, in accordance with the Waste Management Plan; and
- procedures for the notification of pollution incidents

The Site Operations Manager and Site Safety Officer will be responsible for all training activities in respect of this plan.

7.0 Deliveries & Traffic Movement

All construction traffic entering and leaving the site should be closely controlled and consideration given to the local surrounding properties. HGVs making deliveries to the site or removing demolition material etc, should avoid prohibited routes. There are no known weight limits on the approaching roads leading to the development site.

All material deliveries and waste removal should be transferred from within the grounds of the construction site. Deliveries should not be unloaded from the main access road and only within the grounds of the application site. Waste to be collected from the appropriate waste collection point also within the grounds of the construction site.

Typical deliveries will be scheduled to be:

- outside of peak traffic times – between 8.00-9.00am and 3.00-4.00pm
- deliveries to be direct to site and space provided within the site for storage, no deliveries will be stored outside of the site boundaries
- ensure clear passage is available to nearby facilities within the business park
- parking will be monitored by contractor to ensure no concerns are raised with the local resident and business park users
- contractor/visitor parking to be onsite with a min. provision of 3 spaces.

8.0 Working Hours

It is proposed that the working hours for the project will be as follows:

- Monday – Friday | 8.00am to 6.00pm
- Saturday | 8.30am to 1.30pm
- Sunday & Bank Holidays | No Working Hours