



Thames Water Utilities Ltd

Latton Water Treatment Works

Construction Environmental Management Plan

664572-01 (03)

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RSK GENERAL NOTES

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Author	Eleanor Lee	Technical reviewer	Georgina King
			
Signature		Signature	
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Thames Water Utilities Ltd

Latton Water Treatment Works: Construction Environmental Management Plan (CEMP)

664572- 01 (03)

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ABBREVIATIONS

Term	Definition
BCT	Bat Conservation Trust
BRE	Building Research Establishment
BS	British Standards
CDM	Construction, Design and Management
CEMP	Construction Environmental Management Plan
CO	Carbon Monoxide
COPA 74	Control of Pollution Act 1974
COSHH	Control of Substances Hazardous to Health
DoWCoP	Definition of Waste: Code of Practice
ECow	Ecological Clerk of Works
EMS	Environmental Management System
EPS	European Protected Species
FEL	Front-end loader
GCER	Gloucestershire Centre of Environmental Records
GCN	Great Crested Newts
HPI	Habitat of Principal Importance
HSE	Health, Safety and Environment
LED	Light-Emitting Diode
ILP	Institute of Lighting Professionals
INNS	Invasive Non-Native Species
ISO	International Organization for Standardization
IRZ	Impact Risk Zone
LWS	Local Wildlife Site
MAGIC	
MMP	Materials Management Plan
NO _x	Nitrogen Oxide
PM ₁₀	Particulate Matters less than 10µm
PPE	Personal Protective Equipment
RAMS	Risk Assessment and Method Statements
REL	rear-end loader
RSK	RSK Environment Limited

SAC	Special Area of Conservation
SSSI	Site of Special Scientific Interest
WCA	Wildlife and Countryside Act
WSBRC	Wilshire and the Swindon Biological Records Centre
WTW	Water Treatment Works
Units	
m	metre
km	kilometre
db(A)	A-weighted decibel

GLOSSARY

Term	Definition
Best Practicable Means	Effective, sustainable methods and strategies that minimize environmental impact, optimise resource use, and promote long-term environmental health, often based on established standards and successful past practices.
Client	The organisation (Thames Water Utilities Ltd)
Construction Management Plan (CEMP)	Document outlining how a construction project will be managed, detailing environmental mitigation, procedures, safety measures, schedules, resources, and compliance requirements.
Designated Ecological Site	Areas of land subject to project through UK legislation, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR).
Duty of Care (waste)	The legal responsibility of waste producers, handlers, and transporters to ensure that waste is managed, stored, transported, and disposed of safely, without causing harm to human health or the environment.
Environmental aspects	An element of an organization's activities, products, or services that can impact the environment, either positively or negatively.
Environmental impact	The effect that an activity, project, or process has on the environment, including changes to air, water, land, ecosystems, and natural resources, as well as potential harm to human health and biodiversity.
Environmental management measures	Actions proposed to avoid, prevent, reduce and where possible, offset significant adverse effects arising from the whole or specific elements of the Proposed Development on the environment.
Environmental Management System (EMS)	A set of processes and practices that an organisation uses to manage its environmental impacts, improve its environmental performance, ensure compliance with regulations, and continuously monitor and enhance its environmental practices in line with ISO 14001.
Flood Map for Planning	Defines Flood Zones based on annual probability of flooding from fluvial and tidal sources to inform development planning and flood risk assessment. Nationally consistent delineation of 'high', 'medium' and 'low' flood risk updated by the Environment Agency as deemed appropriate, typically on a quarterly basis.
Flood Zone 1	This zone comprises land assessed as having less than a 1 in 1,000 (0.1%) annual probability of flooding from rivers or the sea in any year.
ISO 14001	Provides a framework for organisations to implement an effective Environmental Management System (EMS) to achieve these goals, focusing on continual improvement, resource efficiency, and minimising the environmental footprint.

Principal Contractor	The person or organisation appointed by FCC to undertake the construction of the Proposed Development, including the management of the construction process and health and safety on Site.
Proposed Development	The development for which a planning application is sought. In this instance this includes alterations to the existing Thetford Waste Transfer Station.
Receptor	A component of the environment, such as people, wildlife, or ecosystems, that may be affected by environmental impacts or hazards.
Site	The extent of the development site, as defined by the Order Limits.
Special Area of Conservation (SAC)	Areas designated for the conservation of natural habitats and wild species, as defined in the EU Habitats Directive (92/43/EEC), with protections carried over into UK law through the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, ensuring the continued protection of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) post-Brexit.
Special Protection Area (SPA)	Sites classified in accordance with Article 4 of the EC Birds Directive (2009/147/EC). They are classified for rare and vulnerable birds (as listed on Annex 1 of the Directive), and for regularly occurring migratory species.
Supplier	The party (Manufacturer or Vendor) that manufactures or supplies equipment or services to perform the duties specified by the Company or Contractor.
Waste	Any substance or object which the holder discards or intends or is required to discard.
Waste hierarchy	A guiding theme for waste policy at all levels. Establishes an order of preference for the management of waste, to maximise the prevention of waste, whilst minimising disposal. The Waste (Management) Hierarchy is established in the Waste Framework Directive (Directive 2008/98/EC), and prescribes the following: • Prevention (Most preferred option); • Preparing for reuse; • Recycling; • Recovery; and • Disposal (Least preferred option).

1 INTRODUCTION

RSK Environment Limited has been commissioned by Thames Water Utilities Ltd to produce a Construction Environmental Management Plan (CEMP) to support the planning application with Wiltshire Council for the proposed demolition of existing outdated laboratory/office/welfare building and provision of replacement laboratory/office/welfare facilities building of Latton Water Treatment Works (WTW), Cirencester Road, Down Ampney, Cirencester, GL7 5QN.

This CEMP is a live document and is subject to change throughout the Project. Where necessary, agreement to the changes will be sought from the Client and statutory consultees.

1.1 Aim

The aim of this CEMP is to ensure that the construction works outlined in this document do not result in unacceptable environmental impacts. In particular, the CEMP shall:

- Provide a mechanism for ensuring that measures to mitigate potentially adverse environmental impacts are implemented;
- Provide assurance to third parties that their requirements with respect to environmental performance will be met; and
- Provide a framework for compliance auditing and inspection to enable the Project to be assured that its aims with respect to environmental performance are being met.

1.2 Objectives

The main objective of this CEMP is to set out how construction works will be managed to reduce, avoid, and mitigate adverse impacts.

This CEMP contains the site-specific control measures that will be applied by the Principal Contractor and where relevant its sub-contractors during the construction stages. In preparing this CEMP the requirements of the following documents have been considered:

- Planning Statement, Thames Water, November 2024.
- Ecological Impact Assessment, Maydencroft, October 2024.

A copy of this CEMP will be provided to each Contractor working on behalf Thames Water Utilities Ltd. The Principal Contractor is required to maintain a copy of the CEMP at all work site offices for reference by the entire workforce. It must be accessible to all site personnel and representatives of the relevant enforcement authority, and all subcontractors.

1.3 Statutory Guidance and Best Practice

All site works shall be undertaken in compliance with this CEMP and with all applicable legal and regulatory requirements. It is the full responsibility of all Principal Contractors to ensure that their works do not contravene legal requirements, and adherence to this

CEMP alone cannot be a full defence regarding legal action against the Principal Contractor.

The Principal Contractor shall comply as necessary with the Construction (Design and Management) Regulations 2015 (CDM) and shall comply with all applicable pollution control regulations in which case the Principal Contractor shall obtain and keep current any necessary consent, authorisation, approval or permission (Section 6.10).

The Principal Contractor shall, where relevant, undertake construction works in accordance with current guidance and best practice, including:

- Environmental Good Practice on Site Guidance (C811, fifth edition, Ciria, 2023);
- Wiltshire Council requirements
- National Planning Policy Framework 2023;
- Control of Dust from Construction Sites (BRE DTi Feb 2003);
- British Standards 5228-1:2009+A1:2014: 'Code of Practice for noise and vibration control on construction and open sites – Noise';
- Institute of Lighting Professionals (ILP). Guidance Notes for the Reduction of Obtrusive Light. ILP GN01:2011; and
- Pollution prevention guidance set out at <https://www.gov.uk/guidance/pollution-prevention-for-businesses>.

1.3.1 Environmental Management System

This document has been produced in accordance with principles outlined in International Organization for Standardization (ISO) 14001:2015. The Principal Contractor appointed to the works is expected to demonstrate to the principles of ISO 14001:2015 and to have an Environmental Management System (EMS) certified to the standard.

2 THE PROJECT

The client is Thames Water Utilities Ltd who shall have ultimate responsibility for the construction works. The client will employ a main contractor (and directly or indirectly as required) certain sub-contractors to carry out the works on site.

The main details of the project are summarised in this section; the description is limited to an overview of the main element/approaches sufficient to provide an understanding of the approach to the planned works, and the roles of those main parties responsible for undertaking each part of the works.

2.1 Project Description

The proposed development consists of Latton WTW, Cirencester Road, Down Ampney, Cirencester, GL7 5QN for which Full Planning Permission with Conditions (reference number: PL/2024/10403) was granted by Wiltshire Council on 28th February 2025 for the construction of demolition of existing WTW outdated laboratory/office/welfare building and provision of replacement WTW laboratory/office/welfare facilities building.

The proposed development Latton WTW will comprise of the following aspects:

- Demolition of the existing laboratory/office/welfare building;
- A new two storey office/welfare/laboratory building (measuring 19m in width x 11.5m in depth x 10.4m high); and
- a single storey plant room on the north-western elevation (measuring 3.79m x 3.79m (14.3m²).

This CEMP has been prepared to satisfy condition 3 of the approved planning application (reference: PL/2024/10403) consultation with Wiltshire Council which states:

“The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction and demolition phase environmental management plan, definitions and abbreviations and project description and location;*
- ii. A description of management responsibilities;*
- iii. A description of the demolition and construction programme;*
- iv. Site working hours and a named person for residents to contact;*
- v. Detailed Site logistics arrangements;*
- vi. Details regarding parking, deliveries and storage;*
- vii. Details regarding dust and noise mitigation;*
- viii. Details of the hours of works and other measures to mitigate the impact of demolition and construction on the amenity of the area and safety of the highway network; and*
- ix. Communication procedures with the LPA and local community regarding key construction issues – newsletters, fliers etc.*

There shall be no burning of construction or demolition materials undertaken on site at any time.

Construction and demolition hours shall be limited to 0800 to 1800 hrs Monday to Friday, 0800 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of bat roosts and nesting opportunities for birds (e.g. bat and bird boxes) shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

Reason: To provide mitigation /enhancement for biodiversity.

2.2 Site Location and Plan

The site is located within Latton WTW, situated about 800m north-east of Cerney Wick and 1.6km north-west of Latton, as shown in Figure 1. The site is in close proximity to industrial business units approximately 50 m north and 40m west. The closest residential properties are approximately 60m west of the site. Other residential properties can be found approximately 150m north adjacent to the industrial business units and 300m south-east on Down Ampney Road.

The site is accessed via the access road off Down Ampney Road which connects directly onto Cirencester Road leading onto the A419, the junction of which is 800 m northwest of the site.

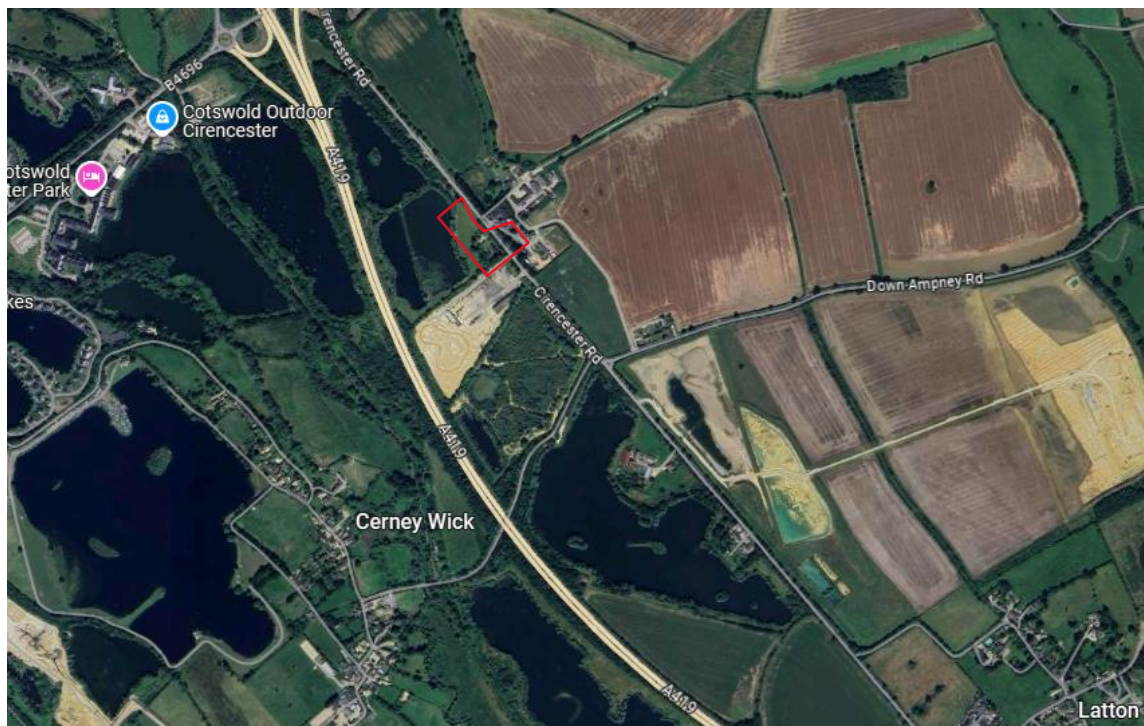


Figure 1: Site Location

2.3 General Site Arrangements

2.3.1 Site Set Up and Compound

The site set up works shall include the establishment of secure site access, works signage, dedicated laydown area(s) and construction compound. The compound shall be set up in accordance with the Client's HSE policy and procedures if available. Full details can be obtained by reference to the Client's HSE procedures; however, as a minimum this will include the display of:

- Environmental Policy;
- Details of environmental constraints including mapping;
- Traffic Management information; and
- Site information.

The main site compound area is illustrated below in Figure 2. Parking for site personnel and storage areas will be provided within the site compound/parking area (marked in blue in Figure 2).



Figure 2: Compound and Traffic Plan

Materials and deliveries will be made within the construction zone using the 'T' junction in front. The site compound area areas will become the responsibility of the Principal Contractor.

During the demolition and construction phases, vehicles will use the site access from Down Ampney Road to enter and exit the site, whilst personnel from Thames Water will continue to use the existing site access for their day-to-day operations, as detailed on Figure 2.

2.3.2 Fencing and Site Security

Only authorised personnel will be permitted on site. All visitors shall be required to enter through the main site access and report to the Construction Manager/Site Manager. All visitors will be required to sign in and out to ensure that site management is aware of the people on site in the event of an emergency.

Visitors and site team will be required to undergo induction training, wear the necessary PPE and be accompanied by a representative on site at all times.

The Site shall be checked on a regular basis to ensure that it is maintained in good condition and is secure. The Principal Contractor shall provide further information.

2.3.3 Site Lighting

Site lighting shall be established in accordance with the Clients HSE Policy, environmental management requirements established through environmental assessments and surveys, and planning conditions issued by Wiltshire Council.

Section 35 of The CDM Regulations (2015) states the Site must be provided with suitable and sufficient lighting, which must be, so far as is reasonably practicable, by natural light. This relates to both the construction site as well as the approach and traffic route to the Site.

Site lighting will be at the minimum luminosity necessary to enable the safety and security of the construction site. In determining temporary construction lighting arrangements for the site, consideration will be given by the Principal Contractor to sensitive receptors that may experience a nuisance by the light, including wildlife.

General control measures for the use of lighting on site are outlined below:

- Temporary site lighting when used adjacent to residential areas must be fixed with a noise screen to keep noise levels to a minimum;
- As far as is practical, lighting must be directed away from residential properties; and
- Lighting should always be positioned to avoid glare.

An Ecological Impact Assessment was produced by Maydencroft in October 2024. The report details bat mitigation including:

Any new temporary or permanent lighting should be designed to avoid light-spill onto the site boundaries and boundary vegetation. If permanent lighting is to be installed it must follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note (BCT & ILP, 2023).

Mitigation measures for external lighting will include:

- Only luminaires with an upward light ratio of 0% should be used; All external luminaires used on site should lack UV elements and be warm white coloured (ideally < 2700 Kelvin) to reduce blue-light components;
- LED luminaires should be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability;
- Where security lighting is installed, this should be motion-activated;
- Lights should not be directed at boundary vegetation. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill.

2.3.4 Working Hours

The normal hours of working (including access and egress) on any part of the development during the construction period will be:

- 08:00 hours to 18:00 hours Mondays to Fridays;
- 08:00 hours to 13:00 hours on Saturdays.

The following controls will also apply to the works:

- No works, including site deliveries and collections, will take place on Sundays or Public Holidays.
- There will be no stacking of lorries on the site boundary outside of the working hours.

Any works outside of the normal hours of working will be subject to the requirement to obtain consent from the Local Authority. The agreement should include working hours and methods to ensure that the 'best practicable means' to control potential nuisances are included.

Normal hours of work set out above do not apply to emergency works nor to equipment that is required to operate continuously.

2.4 Project Programme and Key Dates

The demolition phase is anticipated to commence 21st July 2025, the construction phase is anticipated to commence 22nd September 2025, and works are anticipated to be completed 19th December 2025.

The Outline Programme can be found in Appendix 1.

3 ENVIRONMENTAL ASPECTS

3.1 Residents and Local Community

The site is in close proximity to industrial business units approximately 50m north and 40m west. The closest residential properties are approximately 60m west of the site. Other residential properties can be found approximately 150m north adjacent to the industrial business units and 300m south-east on Down Ampney Road.

Given the location and nature of the development, the construction process may impact upon residential properties located within the vicinity of the proposed development. The sensitivity of each receptor to various construction activities will depend on location and proximity to the site and identified transport routes, however, it is anticipated that the following environmental issues could be of concern if not appropriately managed:

- Nuisance including:
 - Mud on roads spread by construction traffic;
 - Excessive or poorly directed light; and
 - Litter.
- Dust and fumes from transport and construction activity;
- Noise and vibration from transport and construction activity;
- Traffic and transport disruption;
- Disruption to business; and
- Reduction of access to amenity space.

3.2 Air Quality

Atmospheric emissions from construction activities will depend on a combination of the potential for emissions (the type of activity and prevailing conditions) and the effectiveness of control measures. In general terms, there are two sources of emissions that will need to be controlled to minimise the potential for adverse environmental effects.

- Exhaust emissions from site plant, equipment and vehicles; and
- Fugitive dust emissions from site activities.

3.2.1 Exhaust Emissions from Plant and Vehicles

The operation of vehicles and equipment powered by internal combustion engines results in the emission of exhaust gases containing the pollutants Nitrogen Oxide (NO_x), Particulate Matters less than 10µm (PM₁₀), volatile organic compounds, and carbon monoxide (CO). The quantities emitted depend on factors such as engine type, service history, pattern of usage and fuel composition. The operation of site equipment, vehicles and machinery will result in emissions to atmosphere of exhaust gases, but such emissions are unlikely to be significant, particularly in comparison to levels of similar emission components from vehicle movements on the surrounding highways network.

Construction traffic is likely to comprise haulage/construction vehicles and vehicles used for workers' trips to and from the site.

3.2.2 Fugitive Dust Emissions from Construction Works

Fugitive dust emissions arising from construction activities are likely to be variable in nature and will depend upon the type and extent of the activity, soil type and moisture road surface conditions and weather conditions. Periods of dry weather combined with higher-than-average speed have the potential to generate more dust.

Construction activities that are the most significant potential sources of fugitive dust emissions are:

- Earth moving, due to the handling storage and disposal of soil and subsoil materials;
- Construction aggregate usage, due to the transport, unloading, storage and use of dry and dusty materials (such as cement and sand);
- Movement of heavy site vehicles on dry or untreated haul routes; and
- Movement of vehicles over surfaces where muddy materials have been transferred off-site (for example, onto public highways).

Fugitive dust arising from construction and demolition activities can potentially impact upon human health.

Air Quality mitigation measures can be found in Section 4.5.3.

3.3 Noise and Vibration

Construction phase noise impacts arising from equipment, vehicular movements and processes related to the construction of the proposed development have the potential for a short-term impact however standard construction methodologies are to be employed to control noise and vibration during construction in accordance with current legislation and standards including British Standard 5228-1:2009+A1:2014: 'Code of Practice for noise and vibration control on construction and open sites – Noise'.

The Control of Pollution Act 1974 (COPA 74) gives local authorities power for controlling noise and vibration from construction sites. If deemed necessary by the Local Planning Authority a Section 61 consent may be utilised to agree methods, times duration and noise levels with the client. A Section 61 prior consent would need to be used prior to work starting. The lead period for this to be determined is 28 days, meaning that any application to work outside of the permitted hours, shall be required giving at least 28 days' notice.

Proposed measures to manage potential impacts of noise during construction are detailed in Section 4.5.1.

3.4 Ecology

3.4.1 Designated Sites

The Proposed Development does not lie within any statutory or non-designated site, however, is located within 100 m of a Site of Special Scientific Interest (SSSI). Statutory and non-statutory designated sites within 1km of the Proposed Development are outlined within Table 1.

Table 1: Statutory and Non-Statutory designated Sites

Site	Designation	Description	Distance from Site
North Meadow and Clattinger Farm	Special Area of Conservation (SAC)	Has been designated lowland hay meadows which are an Annex I habitat	1.95 km
Cotswold Water Park	Site of Special Scientific Interest (SSSI)	Is designated for its nationally important numbers of breeding waterfowl and diverse assemblage of other breeding birds. In addition, over 20,000 waterbirds utilise the site in the non-breeding season.	75 m
Wildmoorway Meadows	SSSI	The SSSI is designated Unimproved meadows. It is one of the largest remaining examples of unimproved neutral grassland in south-east Gloucestershire.	950 m
Cotswold Water Park Pits	Local Wildlife Site (LWS)	Consists of a series of lakes, silt beds and quarry working with associated grassland, wetland and woodland habitats.	457 m

3.4.2 Habitats

As part of the Ecological Impact Assessment habitat surveys were undertaken in August 2024 by Maydenecroft. Descriptions of the habitats identified are provided below.

Modified Grassland

This grassland habitat merges with the adjacent woodland and extends northwest beyond the development footprint. It is a regularly mown, homogeneous grassland maintained primarily for amenity purposes surrounding some infrastructure.

A notable flush of broad-leaved dock and silverweed occurs behind the car parking area, possibly indicating areas of previously disturbed soils.

No scrub is present within the grassland, there is no evidence of physical damage and minimal bare ground is present. No Invasive Non-Native Species (INNS) are present within this habitat. The habitat does not qualify as a Habitat of Principal Importance (HPI)

and is not considered ecologically significant due to the habitat type being widespread and common.

Other woodland, broadleaf

This broadleaved woodland covers most of the western boundary of the Site and includes a relatively large glade of occasionally managed modified grassland. The glade appears to be maintained through management as is suggested by the presence of numerous saplings but a lack of any more developed scrub.

The habitat does not qualify as a HPI, however, is considered ecologically significant at a local level due to the importance of wooded areas.

Urban habitats

This habitat covers the northern and eastern edges of the site, the areas of existing buildings and a road and pathway adjacent to parking. These urban habitats do not qualify as a HPI and are not considered ecologically significant.

3.4.3 Protected and Notable Species

Mitigation measures are outlined in Section 4.7.

Bats

Data from the Gloucestershire Centre for Environmental Records (GCER) identified 13 species of bats, and data from the Wiltshire and the Swindon Biological Records Centre (WSBRC) identified eight bat species. The closest records retrieved from GCER were from 2008, 659m south west from the Site. Several species are recorded including Daubenton's bat (*Myotis daubentonii*), noctule (*Nyctalus lasiopterus*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), and brown long-eared bat (*Plecotus auritus*). The closest records retrieved from the data search were from WSBRC on the Site itself in 2015, these include lesser horseshoe bat (*Rhinolophus hipposideros*), noctule (*Nyctalus lasiopterus*), and soprano pipistrelle (*Pipistrellus pygmaeus*).

No bats were identified emerging from the building on either survey conducted on Site. Noctules (*Nyctalus noctula*), common pipistrelles (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and myotis spp. were heard on the detector flying by but not seen flying close to the building.

The habitats on Site and surrounding the Site are considered to be suitable for foraging and commuting bats. The woodland on Site as well as hedgerows and waterbodies off site in the Cotswolds Water Park SSSI are considered suitable for both foraging and commuting bats. Known bat roosts are not known in the locality. As such, the Site is considered to be of moderate suitability for foraging and commuting bats.

Badgers

The WSBRC identified four records of badger. The closest record was 678m south of the Site in 2015. No records were returned by the GCER.

The woodland and modified grasslands on Site provide suitability for foraging and setting badgers. The woodland provides opportunities for badger setts however, during the Site survey, no evidence of badger setts was identified within the woodland. The grassland provides suitable foraging habitat for badgers due to being kept regularly mown, although

no evidence of foraging was identified. The habitats surrounding the Site are considered to be of suitability for badgers, as such, it is considered that badgers may utilise the Site intermittently for commuting and foraging.

Birds

The GCER data search returned 84 species of bird, of which 15 are roof nesting species. WSBRC returned 98 bird species. The closest records were 99m north east of the Site and included 12 species, the most recent of which was a barn owl (*Tyto alba*) identified in 2024.

The WSBRC data search returned 720 bird records representing 27 species listed on Schedule 1 of the Wildlife and Countryside Act (WCA). The closest records were located 99 meters northeast of the site, including a barn owl (*Tyto alba*) recorded in 2024 and a red kite (*Milvus milvus*) in 2022.

The woodland on Site is considered to be suitable for common breeding birds. Bird species observed in the woodland include blackcap (*Sylvia atricapilla*), blue tit (*Cyanistes caeruleus*), robin (*Erithacus rubecula*), chiffchaff (*Phylloscopus collybita*), and great tit (*Parus major*). As such, it is considered highly likely that nesting birds utilise the suitable habitats during the breeding season.

Hazel dormice

The desk study returned no records of hazel dormouse (*Muscardinus avellanarius*). In addition, no granted EPS licence applications were returned on MAGIC within the locality. The woodland on Site is not considered suitable for hazel dormice due to the lack of connectivity with other suitable habitat within the locality. In addition, the woodland does not contain many species which are known sources of food for hazel dormice. As such, hazel dormice are considered likely absent from Site and will not be considered further.

Amphibians

WSBRC returned 13 records of common frog (*Rana temporaria*), the closest record being 220m north east of the Site in 2010. 64 records of common toad (*Bufo bufo*) were also returned, the closest being 173m south west of site in 2014. A singular great crested newt (*Triturus cristatus*) was recorded in 2008, just 95m north east of the Site.

There are no waterbodies on Site which are considered suitable for amphibians. However, four ditches and waterbodies within the Cotswolds Water Park are located within 250m of the Site, although not well connected to the Site. The likelihood of Great Crested Newts (GCN) being present within the waterbodies at Cotswolds Water Park is significantly reduced by the number of waterfowl utilising the ponds year-round.

In addition, the habitats on Site are considered sub-optimal for amphibians including great crested newt. The woodland provides some suitability but is fairly open with limited opportunities for sheltering or hibernation. In addition, should GCN or other amphibians utilise the waterbodies off Site, it is considered highly unlikely they would travel to Site for the habitats present. Cirencester Road to the west of the Site is considered to be a barrier to movement from suitable waterbodies to on-site habitats. As such, amphibians (including GCN) are considered likely absent from Site and will not be considered further.

Invertebrates

Records of three invertebrate species were provided by the WSBRC: common darter (*Sympetrum striolatum*), green-brindled crescent (*Allophytes oxyacanthae*), and cinnabar moth (*Tyria jacobaeae*). The closest record was a cinnabar moth recorded in 2015, 442m south west of the site. No records were returned by the GCER.

The habitats on Site are considered unlikely to support a significant assemblage of invertebrate species due to the relatively small size of the woodland on Site and the lack of structure within the grassland. As such, invertebrates will not be considered further.

Hedgehog

A total of four Western European hedgehog (*Erinaceus europaeus*) records were returned in the WSBRC data search. The most recent record was 163m east of the Site in 2009. The woodland on Site may provide sufficient shelter for foraging, commuting and sheltering hedgehog. In addition, the grassland on Site provides opportunities for foraging. However, no evidence of hedgehog was identified.

Reptiles

One reptile record was returned by WSBRC. This was a grass snake (*Natrix helvetica*) identified in 2015, 719m south of the Site. No records were returned by the GCER. The modified grassland does not provide suitability for reptiles due to the lack of structure and shelter provided. The woodland on Site is considered suitable for sheltering reptiles but does not provide the conditions required for hibernating reptiles. Suitable habitats are present in the form of hedgerows, unmown grassland and ruderal vegetation, elsewhere within the WTW and surrounding landscape. As such, it is considered that reptiles may utilise the habitats on Site intermittently.

Otter

No EPS licence applications were recorded for otter within the locality. A total of 15 Eurasian otter (*Lutra lutra*) records were returned in the WSBRC data search. The closest record was from 2001 approximately 549m west of the Site. The GCER data search provided a singular Eurasian otter record from 2021.

The woodland on Site provides some limited suitability for sheltering otter, however, due to the lack of watercourses present within the immediate vicinity of the Site, it is considered highly unlikely that otter would be present. As such, they will not be considered further within this report.

Water vole

No EPS licence applications were recorded for European water vole (*Arvicola amphibius*) within the study area. The GCER returned two European water vole records and the WSBRC returned 11 records. The closest record was from 2015, 443m south west of the Site.

The habitats on Site are not considered suitable for water voles. In addition, water voles predominately live within marginal and aquatic habitats, which are not present on Site. As such, water voles are considered likely absent from Site and will not be considered further within this report.

Invasive non-native species (INNS)

No invasive species were identified within the Site survey. As such, INNS are not considered further.

3.5 Water Resources and Flood Risk

No main rivers are located in the vicinity of the Site. The closest main river is approximately 650m west of the site.

The site is located within Flood Zone 1 as identified on the Environment Agency indicative flood map shown below in Figure 3, and therefore, the probability of river is low with a 1 in 1,000 annual probability of river (<0.1%). The Flood Risk Assessment also considers the potential consequences of flooding from all other sources, which include directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals lakes and other artificial sources, and concludes the potential flood risk is low to medium.

The Site is considered to be low risk from all sources of flooding. This is not expected to increase following development, provided that the recommendations in Section 4.8 are considered.



Figure 3: Flood Risk Map for Planning (Source: Environment Agency, 2025)

3.6 Traffic, Transport and Rights of Way

3.6.1 Traffic

As detailed in Figure 2, Thames Water traffic will use the existing site access via Cirencester Road. The construction site is accessed via the access road off Down Ampney Road which connects directly onto Cirencester Road leading onto the A419, the junction of which is 800 m northwest of the site.

3.6.2 Public Rights of Way

There are no Public Rights of Way that cross the Proposed Development site.

Traffic Management measures can be found in Section 4.9.

3.7 Waste Management

The Site will operate in full compliance with the Environmental Protection Act 1990, the Environmental Protection (Duty of Care) Regulations 1991, and all other relevant legislative requirements and the Construction Environmental Management Plan.

Wherever possible, a principle of reduce-reuse-recycle will be adopted. This will be particularly appropriate with respect to the proportions of the Site containing waste and potentially contaminated materials.

An accurate record will be maintained which details all waste disposal from Site such as waste types, quantity of disposal route. The Site will be maintained in a clean, litter-free condition throughout the works.

Measures will be put in place to control pests or scavengers should they be noted during site inspections.

Further waste management measures are listed in Section 4.10.

4 ENVIRONMENTAL MANAGEMENT PROCEDURES

Environmental management measures have been developed to avoid or reduce environmental impacts associated with the construction works. Appendix 2 includes an environmental management matrix that illustrates the association between construction activities, environmental aspects and impacts and the environmental management measures. The matrix defines responsibilities and frequency of actions.

Environmental management measures shall be incorporated into the Risk Assessment and Method Statements (RAMS) prepared by the Principal Contractor. All RAMS shall be communicated to the workforce by the Site Manager.

4.1 Fuel Storage and Refuelling

Fuel storage and refuelling will be managed as follows during construction:

4.1.1 Fuel Storage

- Fuel levels shall be monitored and recorded regularly (sudden changes may be a sign of leaks).
- Fuel tanks, secondary containers and storage compounds shall be inspected regularly for damage, corrosion, leaks, faults and vandalism. Repair defects/faults immediately and retain records.
- The secondary containment system must provide storage for at least 110% of the tanks maximum capacity and ensure that any valves, filters, sight gauges, vent pipes or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges would be contained.
- Fully lockable and labelled 'Fuel Safe Static Tank' will be deployed.
- Sufficient spill kits will be provided. Spill kit supply to be monitored regularly to ensure adequate stock remains full.
- Spill kits will be available within each plant on site and located close to identified pollution sources or sensitive receptors (fuel storage areas, water course crossings, etc.).
- All drains located adjacent or near to refuelling points shall be covered by a drain guard before commencing transfer. All fuel transfers to be supervised.
- Drums must be stored in a secure interceptor drum store within the designated refuelling area.
- Oil spill and oil impacted water must be collected in a fuel safe container with fuel tags. Fuel spills must be contained using the spill kits provided, spills should be reported to the contractor's Site Manager immediately.
- Records must be maintained of all environmental incidents, mitigation works, clean up method and validation.
- A suitable container for hazardous wastes must be provided within the waste compound.

4.1.2 Refuelling

- Where possible, refuelling should only be carried out in a designated area, which will be secured/locked out of hours.

- The refuelling area shall be located away from drains and watercourses (>10m from a watercourse and >50m from a spring, well or borehole).
- Areas of permanent waste oil/fuel/chemical storage will be located 50m away from watercourses or drainage paths. Where this is not possible, advice will be sought from the ECoW and a minimum distance will be agreed with the Client.
- Refuelling will always be supervised by a competent supervisor.
- Mobile plant must be refuelled away from surface waters, drains, permeable pavements and open excavations. A fuel drip tray must be used.

4.2 Use and Storage of Hazardous Materials/Substances

The use and storage of solvents, cements, adhesives, grout and concrete shall be managed as follows during construction:

- Concrete wash-out on site shall only be permitted when the Contractor has provided a designated, suitably prepared wash-out area with signage identifying the area as suitable for wagon wash-out.
- Concrete wash-out may be dried and crushed to be re-used on Site or disposed of in accordance with a Site Waste Management Plan.
- Surplus dry concrete, cement and grout is to be collected and reused where possible e.g., as inert rubble; reuse of dried materials may require environmental permits or exemptions.
- Areas of permeable pavements are not to be used for the temporary storage of cement bags. If unavoidable ensure adequate protection measures are in place to prevent the pavement from becoming blocked.
- The Contractor is responsible for carrying out a risk assessment of each substance and ensuring that all appropriate storage, protective equipment and if necessary, emergency procedures are put in place on Site.
- All hazardous materials shall be labelled, sealed and stored with their COSHH assessment in a bunded and lockable container away from drains and watercourses when not in use.
- COSHH datasheet will be read and understood before using any hazardous materials.
- Any spent (contaminated) spill kits, absorbent granules, sheets or fibres must be disposed of in accordance with COSHH regulations and Site Waste Management Plan requirements.
- Hazardous liquids shall be transferred using a funnel and drip tray and sealed and returned to the container immediately after use. Damaged containers shall be reported to the Site Manager.
- All usages shall comply with its requirements.
- Hazardous liquids must be re-sealed after use. Empty containers are to be disposed of to the designated container within the waste compound.
- Construction workers are required to wear PPE such as gloves and face masks (where appropriate) to prevent dermal contact and inhalation or ingestion.

4.3 Use of Plant and Equipment

- Mains electricity shall be used where available. If not, generators are to be used and must be sized for the required output, if it is diesel they must be set up by the supplier.

- All plant shall be suitability maintained and noise screens shall be used where required. Use generators having a sound power level rating below 65 db(A) canopied and silenced. Position exhausts away from site boundaries and occupied areas when in use.
- To assist with noise attenuation, where possible, generator will be located away from adjacent residents, also taking account of prevailing wind conditions.
- Siting of portable generators must consider proximity to sensitive receptors (e.g., >10m from a watercourse and >50m from a spring, well or borehole) and must be fitted with a drip tray.
- Turn off all plant overnight.
- All equipment shall be inspected before use and any defects/faults reported to the Site Manager.
- Vehicle/plant refuelling in designated compound/areas.
- Sufficient spill kits shall be provided. Kit must be replenished as required.

4.4 Site Set up, Groundwork and Construction

Groundwork and construction will be managed as follows during construction:

- Local Authority consent must be obtained for particularly noisy activities before starting works. For example, crushing and piling. Principal Contractors and operatives must be informed of consent conditions.
- Minimise the use of builders skips and inspect lifting and locking points, doors and door locks and general condition weekly as minimum.
- Ordered materials shall be adequately managed to avoid spoilage or overordering and surplus materials shall be minimised: provide a suitable and sufficiently sized materials storage compound that is lockable and provides an above-ground covered area, protected from wind and rain. Encourage the reuse of cut-offs and arrange for suppliers to take back unused surplus materials and packaging.
- Storage compounds will be located away from any identified water features.
- Surplus materials are to be reused on site where possible. All reuse and recycling to be carried out in accordance with the terms of a valid waste exemption or voluntary codes of practice/protocols.
- Excavated material surplus shall be minimised so far as practicable; details of all inert material reuse on site including composition and disposal location must be mapped and records retained.
- If necessary temporary bunding and/or settlement ponds will be installed to allow for isolation and onsite treatment of any sediment laden or contaminated water prior to discharge to the drainage system.

4.5 Pollution Control/ Nuisance and Disturbance

Mud, dust, noise, light, litter and water pollution have the potential to cause nuisance and in some cases complaints and statutory nuisance and therefore must be minimised. The following processes and procedures shall be implemented to manage potential nuisance issues.

4.5.1 Noise

- All work will be carried out where possible in accordance with BS 5228-1:2014 – Code of practice for noise and vibration control on construction and open sites.
- Plant shall be selected with noise levels in mind and it is important that quiet plant or silent plant is used. If possible, electrically powered plant should be used.
- Only plant that conforms to the relevant noise emission standards would be used during the construction of the proposed development.
- Use of acoustic screens or covers where required.
- Noisy works and deliveries to and from the site shall be conducted within the core working hours. Where necessary, deliveries outside of these core hours would be agreed in advance with the local authority.
- If operations involving high noise levels must take place, consideration should be given to the people in the immediate vicinity and such works should be limited to the times which will have least impact on the neighbourhood.

4.5.2 Lighting

- Lighting shall be switched off when not in use unless specifically needed for construction activities or for security and / or health and safety requirements.
- Glare (and the potential for complaints) caused by poorly directed security and floodlighting shall be minimised by ensuring that light fittings are horizontally mounted and directed inwards on Site.
- Temporary lighting fixtures are to be installed and designed to provide full cut-off or should be directionally shielded to ensure that artificial light is controlled and substantially confined to the defined area intended to be illuminated.
- Post-installation checks and monitoring of the lighting installations shall be undertaken to ensure that correct tilting angles and appropriate direction of lighting is achieved. This will allow adjustments to be made, where practicable, should undue light spill or glare be identified.
- Wherever possible, lighting shall be located and directed so that it does not cause unnecessary intrusion to adjacent buildings.
- The construction areas close to walkways or roadways shall be lit in an appropriate way to minimise glare and shall be clearly defined at all times to ensure the safety of motorists, cyclists, pedestrians. This will also assist in defining the limits of the construction area for motorists, cyclists and pedestrians.
- Temporary walkways, roads or parking areas shall be illuminated in accordance with current guidance stipulated in the current ILP Guidance Notes.
- Care should be taken to avoid casting shadows from hoarding on the surrounding and adjacent footpaths and roads.
- Light spillage shall be reduced by directing any construction lighting below the horizontal plane, at an angle of less than 70 degrees away from features that offer suitable bat roosting potential.

4.5.3 Dust and Mud

- All work will be carried out where possible in accordance with Control of Dust from Construction Sites (BRE DTi Feb 2003).
- Where foreseeable and significant dust is to be generated during an operation, dust fencing and/or barriers must be provided to minimise impact.
- Timing of earthworks and material movements shall be planned to reduce double handling and minimise traffic movements and therefore associated dust and mud.

- Stripping and stockpiling of soil shall be minimised where possible.
- Site roads shall be kept clear of soil and debris as much as possible.
- All contractor vehicles and private cars are to be parked in the designated area within the site compound and to be removed from site when not in use;
- If dust levels remain excessively high when adequate control measures are in place and operating effectively, then reduce or postpone works during such times (e.g. during dry or windy periods).
- Water can be sprayed onto material to dampen down any potential contaminated dust and prevent it from becoming airborne.
- Construction vehicles shall be regularly maintained to ensure mud-flaps etc. are effective.
- Activities associated with the use of construction vehicles (such as washdown facilities) shall be appropriately managed to contain contaminants and regulate the release of water back into the natural environment.
- Site layout shall be planned so that machinery and dust causing activities are located away from receptors, as far as is possible.
- Where feasible the site or specific operations shall be fully enclosed where there is a high potential for dust production and the site is active for an extensive period.
- The Site shall be set up with hoarding to reduce the liberation of dust from the site. The contractor shall consider the use of a 'green'/vegetated hoarding to reduce particles and reduce carbon dioxide levels.
- Haul routes shall be hard surfaced and/or effectively damped down.
- All vehicle engines will be switched off when not in use to reduce particulate emissions.
- Exhaust systems will be fitted with particulate filters and catalytic converters as necessary.
- Stockpiles shall be covered, seeded or fenced (as appropriate) to prevent wind whipping.
- Excavated materials undergoing treatment shall be covered to reduce the release of odours and vapours.
- Mechanical road sweepers shall be employed to clean roads after movement of soil and of any dust and debris if it is generated within the vicinity of the site entrance.
- All loads entering/leaving the site shall be covered.
- Drop heights must be kept to a minimum and conveyors and enclosed wherever possible.

4.5.4 Water Pollution

- Surface water and drains must be protected from silt run-off: use drain guards to protect drains. Use straw bales, gravel traps or silt fencing to protect surface waters. All silt protection measures must be inspected frequently and maintained throughout the works.
- Stockpiles of contaminated materials must be situated on an impermeable surface at least 10m from any surface waters or drains, and run-off collected within a bund.
- Tracking or washing out next to drains/surface waters must be avoided.
- When dewatering, any pump shall be switched off before removing the last portion of water and suspended solids will be allowed to settle out before discharging
- All drains located adjacent or near to generators to be covered with drain guards.

- Potentially contaminated water must be tested before dewatering. Contaminated water must be treated or discharged off site.
- Road sweepers shall be utilised where necessary.
- Silty water and associated run-off to surface water and drains must be avoided: minimise any areas of soil stripping and stockpiling, control water volumes used to suppress dust, batter/sheet stockpiles where required.
- If a discharge consent is required, then all conditions within the consent must be understood before commencement of dewatering.

4.6 Good Housekeeping

- Maintain good housekeeping and site working practices to control litter, insects or vermin. For example, dispose of food into appropriate receptacles.
- Skips shall be kept in a central/designated area away from boundaries, and the only generators are small ones used in short duration for power tools.
- All skips and other waste storage containers will be covered.
- Hazardous waste must be separated and stored; spray cans should not be left outside of containers once used.

4.7 Ecology Mitigation

4.7.1 Designated Sites

International Statutory Sites

Due to the distance between the Site and the SAC and the small scale of the works, no impacts are anticipated. As such, internationally statutory sites will not be considered further.

Statutory Sites

The Site falls within the Impact Risk Zone (IRZ) for both the Cotswold Water Park SSSI and the Wildmoorway Meadows SSSI. The proposed developments likely to affect the SSSI requiring the local authority to consult Natural England include the following which could be considered relevant to this development:

“All consultations: All planning applications (except household applications) where the proposed development is outside or extends outside existing settlements/urban areas and will increase lighting levels or affect greenspace, farmland, semi natural habitats, trees/woodland, waterbodies, rural buildings/structures (manmade or natural) or linear landscape features such as hedgerows, streams and rivers through direct loss, fragmentation or change of use.”

It is considered that the development on Site fits within the above description as it will result in the loss of a small number of trees, a building and an area of modified grassland. However, it is considered highly unlikely that the proposed development will impact the SSSI, as it is so small scale and within an existing urban environment.

Non-statutory Sites

The proposed development is considered to be small enough in scale and a sufficient distance from the non-statutory site to not cause any significant impacts. As such, no impacts are anticipated.

4.7.2 Habitats

The mitigation hierarchy will be followed to include in order: avoidance of impacts, mitigation of impacts and compensation for loss/impacts. Where avoidance and mitigation cannot be achieved, compensation will be required and biodiversity net gain will be utilised to ensure that all losses are adequately compensated and a minimum 10% gain in habitat units is achieved through the development.

Other Woodland; broadleaved

All mitigation measures detailed within the BS5837 Tree Protection Plan and Arboricultural Method Statement must be adhered to throughout the development works.

Modified grassland

Mitigation measures are not considered necessary for the retained grassland habitats.

4.7.3 Protected and Notable Species

The mitigation hierarchy will be followed to include in order: avoidance of impacts, mitigation of impacts and compensation for loss/impacts. Where avoidance and mitigation cannot be achieved, compensation will be required.

Bats

Any new temporary or permanent lighting should be designed to avoid light-spill onto the Site boundaries and boundary vegetation. If permanent lighting is to be installed it must follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note (BCT & ILP, 2023).

Mitigation measures for external lighting will include:

- Only luminaires with an upward light ratio of 0% should be used; All external luminaires used on site should lack UV elements and be warm white coloured (ideally < 2700 Kelvin) to reduce blue-light components;
- LED luminaires should be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability;
- Where security lighting is installed, this should be motion-activated;
- Lights should not be directed at boundary vegetation. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill.

Badgers

Any trenches which are due to be left overnight will have ramps installed within them to allow any badgers to escape. Any pipework left on Site overnight will be capped. Should the commencement of works be delayed by over six months, an additional badger walkover survey is recommended to ensure that there is no change to the level of badger activity within proximity of the Site.

Nesting birds

Vegetation clearance should be undertaken outside of the bird nesting season wherever possible (as a guide between late February and August inclusive; dates vary by species and can be affected by prevailing weather condition).

If works to trees or other woody vegetation on Site are undertaken within the bird nesting season then an ecologist will first need to survey the area for nesting birds. If active nests are identified then clearance in the nesting area would need to be delayed until the young have fledged and/or the nest is no longer in use.

A suitable buffer (the size of which is species-dependent) will be retained around an active nest to allow other elements of work to be progressed. Note that this approach is usually only practical where small areas of habitat will be affected. Vegetation may also be trimmed down in advance of the breeding bird season to discourage birds from nesting.

Hedgehog

A hand search of any suitable habitat will be carried out immediately prior to clearance. Any hedgehogs found will be carefully removed and placed in suitable habitat within woodland, scrub or hedgerow away from the development but remaining within suitable surrounding habitat.

4.8 Water Resource and Flood Risk Management

Generally, the site is considered to be at low risk from all sources of flooding. The flood risk to or from the site will not increase following development, provided that the following recommendations are considered to:

- Setting finished floor levels at or above the existing ground level;
- Surface water generated from the development site should not discharge off the site at a higher rate; and
- Safe conveyance of surface water flows across the site without impacting the development, residents or others.

4.9 Traffic Management

During the demolition and construction phases, vehicles will use the site access from Down Ampney Road to enter and exit the site, whilst personnel from Thames Water will continue to use the existing site access for their day to day operations, as detailed in Figure 2.

The Principal Contractor shall provide for the safe and secure management and control of pedestrian and vehicular movements, both on and off site, to ensure the safety of all members of the general public and workforce at all times throughout the demolition and construction work period in accordance with all requisite Acts and Regulations, including, but not limited to the:

- Health and Safety at Work etc Act, 1974;
- Management of Health and Safety at Work Regulations, 1999;
- Construction (Design and Management) Regulations, 2007;
- Supply of Machinery (Safety) Regulations 1992; and

- Provision and Use of Work Equipment Regulations, 1998.

The Principal Contractor shall be responsible for:

- Promotion, management and control of such general provisions and measures for traffic management and control to be implemented by all contractors and sub-contractors throughout the extent and duration of the construction.
- On-site provision for site access roads and pedestrian footways, with controlled access from the public domain for pedestrians and vehicles, on-site parking provisions, standing, lay-down and unloading facilities for delivery vehicles, and on-site compound, welfare facilities and material holding areas for use by all contractors and sub-contractors.
- Ensuring that the on-site provisions are controlled, managed and shall be safe at all times through the provision of planned and informed procedures and segregation between vehicular and pedestrian traffic.

4.10 Waste Management

The Principal Contractor shall apply the principles of waste hierarchy (eliminate, reduce, reuse, recycle, dispose) to the waste management of the site.

The development shall seek to promote the re-use of excavated materials through optimisation of cut and fill operations to improve the sustainable and cost-effective development of land, as per the Definition of Waste: Development Industry Code of Practice (DoWCoP). In many instances the DoWCoP can provide an alternative to Environmental Permits or Waste Exemptions when seeking to reuse excavated materials, this is only if the process is followed in full and a Materials Management Plan (MMP) is produced that has been signed off by a suitably qualified person and submitted to CL:AIRE

Measures to avoid waste issues are likely to include:

- A waste collection area shall be set up before site works start. This area shall be as close to the site compound as possible with adequate hardstanding for the waste containers and unobstructed access for telehandler and waste removal vehicles.
- Front-end loader (FEL) or rear-end loader (REL) skips shall be provided to segregate wastes including timber and metal. A designated area shall be provided for inert wastes, for example bricks, clay pipes and roof tiles. A designated container[s] shall be provided for hazardous wastes, which and must be clearly labelled.
- Wastes shall be collected by a licensed waste carrier. A copy of all Waste 'Duty of Care' documentation shall be held on site.
- Duty of Care documentation must be completed for all waste transfer copies. They must be signed by a competent person and kept on file in the site office. Waste transfer notes or hazardous waste consignment notes and Duty of Care procedures are to be audited regularly (monthly as a minimum).
- If required, a Site Waste Management Plan shall be made available on site and its requirements understood by all contractors and operatives before starting work on site.
- Road sweepers shall be deployed as necessary. All road sweepers must be removed from site accompanied with a completed waste transfer note from the driver. If road sweepings are inadvertently discharged on site, these should be disposed of appropriately.

- All waste incidents shall be reported immediately to the Site Manager and Environmental Advisor.
- Spoil and recycled aggregate transfers shall be carried out in accordance with an approved Materials Management Plan (or Remediation Strategy in Scotland) and all transfer tickets must be retained on Site.
- Contact the Environmental Advisor if specialist advice on waste segregation and disposal is required.
- Monthly updates on the amount of waste successfully recycled will be made available to the Site Manager and displayed in the site office and can also be issued to the council upon request.

Wherever possible, the following waste streams will be diverted from landfill:

- The site works shall be designed to retain as much soil on site as possible whilst maintaining protection of human health and the environment.
- All timber is to be segregated on site and sent for recycling.
- All metal is to be segregated on site and sent for recycling.
- All inert waste (e.g. bricks, blocks, concrete) will be segregated on site.
- All mixed waste removed from site shall be taken to a material recycling facility for further segregation to maximise recycling and recovery.
- All hazardous waste shall be segregated from all other wastes and clearly labelled.
- All other site waste shall be segregated on site.

5 EMERGENCY PREPAREDNESS AND RESPONSE

5.1 Emergency Preparedness

5.1.1 Spill kits

Spill kits capable of dealing with hydrocarbon and chemical spills shall be available at all worksites. Each storage location shall be clearly visible to the workforce, for instance by deploying clear signage.

If a construction compound, fuel storage point or COSHH store is provided then additional spill kits will need to be available at each separate location.

The spill kit contents shall include absorbent pads, absorbent booms, absorbent granules and hazardous waste disposal sacks as a minimum. Regular checks of the spill kits shall be completed to ensure they remain adequately stocked to deal with environmental incidents.

Spill drills shall be performed periodically to confirm that the workforce can effectively contain and clear up potentially polluting spillages. All drills will be documented and details kept on record for the duration of the works.

5.1.2 Fire prevention

Means to raise the alarm in the event of a fire shall be available at the points of work. An assembly point shall be designated a safe distance from the active works locations and will be communicated to all members of the workforce before works commence. The workforce shall assemble at the point for a roll-call and to receive further instructions. All individuals at the worksite, including visitors, will be obliged to immediately sign in on arrival.

5.1.3 Extreme weather

The Principal Contractor's Site Manager shall register to receive Met Office weather warnings. All warnings issued by the Met Office with the potential to impact upon the works shall be communicated by the Site Manager to the workforce in a timely manner so that measures can be implemented where necessary. In the absence of the Site Manager the Works Environment Manager shall also receive and act upon all alerts.

5.2 Incident Reporting and Investigation

5.2.1 Reporting

All incidents, including near misses, shall be classified according to the categories outlined in Table 2. All categories of environmental incident shall be reported by the Principal Contractor to the client as outlined below.

Table 2: Incident Classification

Incident Classification	Definition
Near Miss	An event, controlled through implementation of an effective incident control measure (e.g. drip tray used, effective use of noise barrier).
Minor Environmental Incident	Incidents that have caused minor harm or damage to the environment e.g. • A minor fuel spill below 20 litres onto ground which is immediately cleared; • A minor spill of a chemical not classified as presenting an ecotoxic risk; • Exceeding noise levels; • Silt runoff from site which does not enter into a surface water feature; or • Excess dust emissions.
Major Environmental Incident	Incident that have caused or may cause significant harm or damage to the environment e.g. • A minor fuel spill which impacts a sensitive land feature, a water, or drains; • A major fuel spillage or 20 litres; • Any spillage of a chemical which is classified as presenting an ecotoxic risk; • Silt runoff from site which enters a water feature; or • Receipt of a nuisance complaint.

Minor incidents and near misses must be reported to the Client within 24 hours. Major incidents must be reported to the Project Manager as soon as reasonably practicable.

The contractor, after informing the Client, shall report all environmental incidents that are required to be reported to the Environment Agency and/or to any other relevant statutory or regulatory bodies. Emergency contact details are outlined in Section 5.2.3 for all contacts relevant to the works.

5.2.2 Investigation

Reporting of an incident to the Project Manager shall, where necessary, commence the incident investigation which shall be jointly conducted between the Client and its contractor(s).

The Principal Contractor shall prepare an investigation report for all environmental incidents. The report is to include:

- Summary of the environmental incident, describing the:
 - Nature of the incident;
 - Details of any pollutant released including the type and quantity of pollutant released;
 - Location for the incident (e.g. grid reference);

- Receptors that were or could have been impacted
- An analysis of what led to the incident occurring
- Summary of immediate actions taken to mitigate the incident
- Summary of any remedial action required
- Lessons learned and future measures or actions to be implemented.

The Client will verify the incident investigation and agree with its contractors any further actions which are to be implemented to prevent a reoccurrence of comparable incidents. A timeline for the implementation of all actions shall be established and the contractors shall provide details of when they have been implemented.

An incident investigation shall be complete when all details have been recorded on file.

5.2.3 Emergency Contacts

In the event of an emergency occurrence at the Site, the Client and its contractors shall determine the relevant statutory and regulatory bodies that must be notified. Notification shall be in accordance with the measures outlined above in Section 5.2.

Table 3: List of Emergency Contacts

Emergency Contacts	
Contact	Contact Details
Thames Water Site Manger – Phil Harding	07747640976
Thames Water Project Manager – Nick Solanki	07747644912
Contractor Site Manager - TBC	TBC
Contractor Environmental Manager - TBC	TBC
Environment Agency Emergency Number	0800 807 060
Health and Safety Executive (HSE Construction)	01519 229 235
Local Authority – Wiltshire Council – Callan Powers	01249 706583
Major Spill Emergency Response – Phil Harding	07747640976
Fire	999 / 112
Police	999 / 112
Ambulance	999 / 112

5.3 Incident Response

All pollution incidents should be managed through the STOP – CONTAIN – NOTIFY concept.

As soon as an incident is identified, the first action should be **STOP** and prevent further discharge to drainage/river/ground.

CONTAIN may constitute control of discharge in the event of a spill, or cessation of works if it is the works that are resulting in the incident, e.g. halting excavations until silt runoff

is contained. It is recognised that due to personal health and safety risks it may not always be safe to stop the source of the spill, for instance if a significant volume of an unidentified substance has been released.

NOTIFICATION should take place as soon as practicable, and frequently can take place while further release is being stopped or while a spill is being contained. The emergency contact numbers outlined in Table 4 should be used.

Appendix 3 consists of standard incident response procedures, intended to provide guidance for the contaminant and limitation of adverse effects.

5.3.1 Oil, fuel or chemical spill to ground

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/valve, correct leaking drum and make the area safe.
- ii. If the spill is migrating, creating a temporary bund to prevent further spread by using spill kit materials / sandbags.
- iii. If drains or field ditches are located nearby, install drain seals / deploy additional spill kit materials to prevent the spill discharging to the drain or ditch.
- iv. Apply absorbent granules or pads (available from spill kit) to the affected area.
- v. The Contractor will notify the Environment Agency regarding the nature and scale of incident. The following information should be included in the notification:
 - o Time of discharge;
 - o Type/quantity of material discharged;
 - o Location of discharge; and
 - o Site contact details.
- vi. The Contractor will notify the Client of the incident and communicate the information provided to the Environment Agency.
- vii. The Client will notify the Local Planning Authority regarding the nature and scale of the incident as per the requirements of the Environmental Damage (England and Wales) Regulations 2015.
- viii. Containment measures should remain in place until the nature and extent of the contamination can be assessed and a remediation strategy must be prepared.

All impacted materials shall be disposed of in accordance with relevant legislative and regulatory requirements and the Duty of Care requirements.

5.3.2 Oil, fuel or chemical to surface water feature

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/valve, correct leaking drum and make the area safe.
- ii. If the source is not readily identifiable, contain first (see below) then identify and prevent further release at source.
- iii. Immediately deploy appropriately sized boom from nearest spill kit across affected surface water feature. Use stakes to attach it to the sides of the surface water feature. Tie booms together to increase length if required.

- iv. Supplement with additional booms across the surface water feature, as required, to contain any migration of the spill not halted by the first installation.
- v. The Contractor shall notify the Environment Agency regarding the nature and scale of incident. The following information should be included in the notification:
 - o Time of discharge;
 - o Type/quantity of material discharge to surface water feature;
 - o Location of discharge; and
 - o Site contact details.
- vi. The Contractor shall notify the Client of the incident and communicate the information provided to the Environment Agency.

All impacted materials will be disposed of in accordance with relevant legislative and regulatory requirements and relevant Duty of Care requirements.

5.3.3 Oil, fuel or chemical spill to drainage system

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/valve, correct leaking drum and make the area safe.
- ii. If source is not readily identifiable, contain the visible pollutant first, then identify and prevent further release at source.
- iii. Immediately deploy appropriate drain cover(s) to affected gullies.
- iv. Supplement with booms around the gully to contain any migration of spill.
- v. The Contractor shall notify the Environment Agency and the relevant water company regarding the nature and scale of incident. The following information should be included in the notification:
 - o Time of discharge;
 - o Type/quantity of material discharged to the drain;
 - o Location of discharge, specifically which drain; and
 - o Site contact details.
- vi. The Contractor shall notify the client of the incident and communicate the information provided to the Environment Agency.

All impacted materials shall be disposed of in accordance with relevant legislative and regulatory requirements and relevant Duty of Care requirements.

5.3.4 Discovery of unexpected contamination

- i. On the discovery of unexpected contamination, the Contractor will immediately halt works in the area.
- ii. If impacted materials have already been removed they shall be returned to the excavation or placed on to a membrane, e.g. terram, to prevent migration of the contaminant to another area.
- iii. Contractor to report the situation to the Client.
- iv. Arrangements will be made between the Contractor and the Client for samples of the contamination to be collected and tested on fast turnaround.
- v. Contractor to only continue with works in the area once the test results have confirmed the contaminant and a safe means of working has been established.

The Contractor shall be free to continue works in areas unaffected by the contamination, BUT the Contractor will not speculatively continue to excavate material to find the extent of the contamination without supervision from a geo-environmental engineer.

All impacted materials will be disposed of in accordance with relevant legislative and regulatory requirements and relevant Duty of Care requirements.

5.3.5 Explosion/Fire Procedure

Explosion/fire incidents should also be dealt with through health and safety procedures. In the event that a fire is detected or an explosion occurs:

- i. Notify the emergency services and evacuate the area.
- ii. Attempt to tackle the fire with site equipment only which it is safe to do so.
- iii. Ensure that pollution of nearby water bodies including surface water drainage from fire control water or other substances is minimised. Where possible and safe to do so, any site drainage systems should be protected through the deployment of drain seals/ spill kit materials to ensure any firefighting waters are captured and can be disposed of appropriately.
- iv. At a time when it is acceptable to do so, the Environment Agency shall be notified regarding the nature and scale of incident. The following information should be included in the notification:
 - o Nature of the incident;
 - o Time and date of the incident;
 - o Quantity of fire control water discharged to surface water feature/drainage, where relevant;
 - o Location of discharge; and
 - o Site contact details.

5.3.6 Silt

In the event of an unexpected discharge of silty water, then:

- i. Prevent further release at source e.g. cease dewatering the excavations.
- ii. Contain silt and protect sensitive receptors from further discharge:
 - o If a drain is located nearby, install drain seals or deploy spill kit materials to prevent discharge.
 - o If silt flow is in the direction of surface water features deploy hay bales around the surface feature.
 - o If silt is being generated by runoff from stockpiles deploy spill kit materials, silt fencing or move soil to form a bund at the base to prevent further silt laden runoff from the stockpile.
- iii. If silt is discharged without prior approval the Environment Agency shall be notified. If the silt discharge enters the drainage system the relevant water company shall also be notified regarding the nature and scale of incident. The following information should be included in all notifications:
 - o Time of discharge;
 - o Type/quantity of material discharged;

- Location of discharge, e.g. which drain or surface water feature; and
- Site contact details.

5.3.7 Complaint over a nuisance

This procedure should be followed for all nuisance complaints include noise, dust and light.

- i. Immediately stop the activity leading to the complaint; or where not possible to entirely stop the activity reduce it to the lowest possible level e.g. shut off all non-essential plant.
- ii. Remain polite and courteous. If able to resolve the issue through discussion with the complainant, then determine what action is needed and put it into practice.
- iii. Record the details of the complainant including their name, contact details and address. Contractors shall report the details of the complaint and the complainant to the Client.
- iv. The Contractor and the Client will register the complaint on a Complaints Log.
- v. The Client will act on the complaint and remedial actions shall be put in place within 24 hours.

5.3.8 Contamination of or by waste materials

- i. Assess whether the area needs to be evacuated, such as if fumes are being given off.
- ii. Assess whether the damage can be undone through segregation.
- iii. Complete a risk assessment for the task including consideration of any COSHH risks.
- iv. It is safe to do so segregate the waste. If it is not safe to do so, then the full waste quantity is to be consigned as hazardous waste.
- v. The Contractor is to report the incident to the Client.
- vi. Waste is to be collected from site in accordance with normal practice.

5.3.9 Discovery of archaeological artefact or heritage feature

- i. Immediately stop works in the area of the artefact or feature.
- ii. Ensure the area is isolated from interference by erecting fencing around the discovery. Prevent vehicles from navigating through this area.
- iii. Provide a safe means for pedestrians; and if possible, vehicles, to move around the isolated area.
- iv. The Contractor shall report the finding to the Client.
- v. The Client is to arrange for the finding to be assessed by a qualified heritage or archaeological specialist. The Contractor is to prevent tampering with the find until it has been assessed.
- vi. Works to proceed in accordance with the recommendations given by the heritage or archaeological specialist.

5.3.10 Ecological discovery or damage

- i. Immediately stop works in the area.
- ii. Contractor to immediately report the incident to the Client.
- iii. Client to arrange for a qualified ecologist to assess the discovery or damage caused.
- iv. Works to proceed in accordance with the advice received from the ecologist.

5.3.11 Vandalism/theft procedure

Acts of theft and vandalism present the risk that damage may be caused to equipment containing hazardous substances that could cause pollution, or damage may be caused to measures which have been installed to prevent the release of pollution. On identifying an act of vandalism or theft:

- i. The Contractor shall notify the Police of the incident.
- ii. Inspect all fuel storage tanks/drums and equipment to ensure there has been no release of the fuel or other hazardous substances, e.g. hydraulic fluid.
- iii. If a spill is identified follow the procedures for oil, fuel or chemical spills in Section 5.3.1 above.
- iv. Inspect pollution protection measures, e.g. drainage or silt protection, to ensure it has not been interfered with. Where it is possible, correct any issues identified without causing further release.
- v. Inspect site boundaries to identify the access point if not immediately clear and secure the Site.

6 GENERAL ENVIRONMENTAL REQUIREMENTS

6.1 Roles, Responsibility and Authority

The Principal Contractor shall make available sufficient time and resource for the effective management of environmental risks that could arise during construction work. This includes appointing adequately qualified personnel with knowledge and capability in the environmental management of construction site works. Persons having responsibility for environmental site management, and in particular any persons required to undertake and oversee response to any incidents with potential environmental consequences, shall be empowered to make decision and take appropriate action necessary to avoid or mitigate adverse environmental effects, even when this may lead to delay and/or additional cost to the Principal Contractor.

6.1.1 Project Roles

The Thames Water project team and all appointed contractors will be responsible for ensuring that the potential risks to the environment are adequately avoided or controlled by the application of measures as documented within this CEMP, which shall be complained throughout construction. The main organisations and persons involved in the construction stage works are set out in Table 4.

Table 4: Project roles and environmental responsibilities

RACI DETAILS – R – Responsible: The individual(s) who perform an activity responsible for action/implementation – although usually only one, R's can be shared. A – Accountable: the individual who is ultimately accountable including yes/no decision and power of veto – only one (A) can be assigned C – Consulted: the individual (s) to be consulted prior to a final decision being made or action taken – two-way communication I – Informed: the individual (s) who need to be informed after a decision is made or action is taken – one-way communication	Key Control Activity	Developer	Project Manager/ Director	Site /Sub-contractor Manager	Senior Foreman	SHE Manager	All Site Staff/Contractors
	Process Task						
	Developing and maintaining the CEMP	C	A	C	I	R	I
	Monitor environmental aspects through review of construction method statement, identify and control issues.			A	C	R	I
	Monitoring construction works to ensure any necessary environmental issues and control measures are in place; ensuring they are effectively communicated, appropriate and implemented on site.			A	R	C	I
	Ensuring the work is performed by training and qualified staff; and providing training where necessary.		A	R	C	I	I
	Ensuring the adequate resources are allocated for environmental management	I	A	R	C	C	I
	Ensuring that all relevant environmental documentation and information (including permission, consents, permits and assessments) is communicated	C	C	A	C	R	I
	Regular site inspections and maintaining a record of environmental performance; and reporting performance and monitoring environmental performance	I	I	A	C	R	I
	Following good practice and minimising impact of activities on the environment.	C	C	A	R	C	I
	Understanding project environmental obligations and mitigation measures.	C	A	R	C	R	I
	Liaison with local authority, other statutory bodies, members of the public, press and the media.	R	C	A	C	R	I
	Supporting all site staff with environmental management including reviewing and commenting on method statements and risk assessments.		R	A	C	R	I
	Ensuring that the environmental policy of the client is delivered		R	A	I	C	I
	Providing information on waste management/reduction procedures to relevant staff.			A	C	R	I

6.2 Competence, Training and Awareness

The Principal Contractor shall ensure that appropriate awareness training is delivered to all site operatives and only appropriately qualified sub-contractors are appointed.

Every member of the workforce shall be required to participate in a site induction prior to starting work on the Site. The level of induction training will depend upon the position and duties the person is to perform. The site induction will include:

- A brief overview of the works to be undertaken and any potential environmental aspects associated with the construction activities;
- A summary of the sensitive environmental receptors near the Site;
- An overview of the applicable environmental mitigation and pollution control measures; and
- An overview of the health & safety management measures in particular emergency response procedures required at the Site.

The Client will require its Principal Contractor to provide continuing training and awareness raising of the workforce. This can be delivered in the form of Toolbox Talks tailored to the specific environmental mitigation measures required dependent on the work activities being undertaken and to raise awareness on environmental best practice.

Records of all inductions and Toolbox Talk deliveries shall be maintained at the site office. Copies shall be made available to the Client on request.

6.2.1 Internal Communication

The Principal Contractor's Site Manager, Environmental Advisor and other relevant team members shall meet weekly to review the status of environmental aspects including but not limited to:

- Works activities underway and planned;
- Mitigation measures required to be implemented;
- Results of weekly inspections and any audit results/feedback;
- Any corrective and preventative actions required to be implemented;
- Identification of areas for continual improvement;
- Status of staff competence and training needs; and
- Status of CEMP and of any required consent and approvals and the need for review and updating.

The Client shall be informed of the outcome/minutes of all such meetings.

Additional and ongoing communication of environmental performance and requirements is to be determined by the appointed Environmental Advisor and provided as appropriate.

6.2.2 Notice Boards

The Contractor provides and maintains project environmental notice board(s) which are positioned to ensure all operatives are able to review the notice board a daily basis. The notice boards should be updated at least monthly. As a minimum, the notice boards shall contain:

- Clients Environmental Policy;
- Emergency contacts list;

- Relevant statutory and non-statutory advice and guidance; and
- Description of the key environmental risks and intended risk mitigation measures.

These environmental notice boards will be situated in prominent positions including the main reception area of the site office.

6.2.3 Toolbox Talks

Toolbox Talks will be used to inform all site personnel of key information concerning the management of the site, procedures to be followed and expected standards / controls when working on the project. The Toolbox Talks will cover a broad range of topics including those related to best practice environmental management.

A record of Toolbox Talks will be kept on site, starting date, description of non-conformance, potential implications, proposed corrective actions, individual responsible and target data. Toolbox Talks shall include, but will not be limited to, instances where:

- There is a change to existing legislation, which requires an operation change;
- Site inspections or audits have identified corrective actions which require communicating; and
- There are significant changes in environmental conditions i.e. heavy rainfall.

The frequency and topics of the Toolbox Talks shall depend upon the phase construction. They shall be provided as often as necessary to address site-specific environmental requirements.

6.2.4 External Communication

The Principal Contractor, with the agreement of the Client, shall provide advanced notification of the works to those most affected. All local residents and where relevant businesses shall be notified via letters/fliers of the works commencing at least two weeks prior to the contractor starting on site.

A Liaison Officer will be appointed (Thames Water Site Manager – see contact details in Table 3 in Section 5.2.3) to deal with external enquiries and/or complaints; may wish also the specify that the contractor sets up a 'hotline' number and/or email to receive calls during the construction period.

All communication received by the Contractor and the Client on receipt shall assess the complaint and determine what information is required from all parties to formulate a response. The Contractor will endeavour to contact the complainant on the same day. All complaints shall be recorded and investigated.

The Thames Water Site Manager (see contact details in Table 3 in Section 5.2.3) shall serve as the point of contact for the regulatory authorities for their specific activities. Communications from the regulatory authorities received at the worksite by the Site Manager shall be immediately reported to the Client.

A record of all communications shall be maintained by the Principal Contractor. Communications from regulatory authorities concerning incidents are dealt with further in Section 5.3 of this CEMP.

Through the induction all members of the workforce shall be made aware that any direct approaches from member of the public should be directed to their Site Manager. The Site Manager shall record all approaches made by members of the public and shall advise

the Client's Project Team of all comments received at the worksite from members of the public.

6.3 Documentation

The Site Manager and/or work Environmental Advisor shall be responsible for documenting and retaining safe all suitable records relating to environmental issues at the site and/or arising from site operations. Documents shall be stored in a suitable manner and backups created to safeguard the records. The CEMP shall be controlled document and authorised latest version shall be signed and dated by the responsible person[s]. Other site data records and environmental management document would include, but not necessarily be limited to the following:

- Copies of relevant consents, permissions, or other approvals/ authorisations;
- Environmental data records including waste transfer notes/records of waste collection and treatment/ disposal;
- Records of any environmental incidents including actions taken and resolution;
- Records of all plant/equipment entering / leaving site together with any relevant compliance documentation (for instance in respect of noise or air pollutant emissions class);
- Copies of any enforcement notices or instructions issues by the local authority or statutory regulatory body;
- Record of any prosecutions pending or resolved, and any penalties enforced;
- Records of daily site inspections;
- Records of weekly/monthly audits and minutes of environmental team briefings; and
- Records of staff training including site inductions and toolbox talks.

6.4 Monitoring, Inspections and Audits

The Principal Contractor shall be responsible for managing environmental performance during all site works. This will be supported with a programme of monitoring, inspections and audits.

6.4.1 Daily Inspections

Daily inspections shall be undertaken by the Contractor and recorded as follows:

- i. Visual inspection of the site perimeter to check for dust deposition (evident as soiling and marking) on vegetation, cars and other objects.
- ii. Visual inspection of the local haul roads to check their condition to ensure there is no build-up of dust or earth deposits liable to cause dust emissions as vehicles pass.
- iii. Vehicles, equipment and plant inspections shall be completed to check the absence of damage or maintenance issues and that it is correctly functioning.
- iv. Visual inspection of all acoustic barriers / screening to check they are present and in good condition.

- v. Visual inspection of waste containers and waste storage areas to verify wastes are being correctly segregated and to confirm the absence of mixing of hazardous and non-hazardous wastes.
- vi. Visual inspection of all site areas to ensure there is no deposited or wind-blown litter.
- vii. If a waste collection is made, a check shall be made of the Waste Transfer Note / Hazardous Waste Consignment Note provided for the collection.

On all days when potentially dust emitting activities are being conducted, the level of dust generation shall be kept under constant review. A record shall be added to the official site diary when such activities are conducted, the dust emission conditions observed and when necessary, the mitigation measures taken.

Any elements of the site management found to be in an unsatisfactory condition during the site inspection shall be addressed on the day. In the event it is not possible to address the matter on the day it is raised; a note of the reason why shall be made on the inspection record sheet.

6.4.2 Audits

Only suitably trained and competent staff will be authorised to perform environmental audits.

Audits (or at a suitable frequency to be determined by the nature / duration of the work) of the worksites and Contractors shall be undertaken by or on behalf of the Client. All aspects of the environmental management at the site shall be assessed against this CEMP. The audit shall include checks of the site records including the daily inspection record sheets, vehicle arrival logs and waste disposal paperwork. All audits shall be documented; where audit actions are raised, close out of these actions shall be assessed at the following audit.

An audit of an Environmental Management Process will be undertaken by the Environment Manager throughout the Project duration and will typically cover the activities identified in the above chapters.

6.4.3 Non-Conformity and Corrective Action

Where the client has a concern or raises an issue for resolution, or where potential issues are raised from an inspection or audit of the site/ operations, or by a regulatory authority, the contractor shall investigate the root cause and any implications arising from the issue and shall if necessary following discussion with the client implement measures to rectify the problem.

The contractor shall monitor the effectiveness of the corrective action and report the outcome to the client and where relevant the regulatory authority. All documentation of the issue/ event and corrective action/ outcome shall be retained by the contractor.

Where necessary the CEMP and any associated documentation shall be revised and re-issued to avoid recurrence of the issue/ problem.

6.4.4 Monthly Data Reporting

At the end of each calendar month the Principal Contractor may be required to submit the Client all relevant data on the following:

- Energy usage (i.e. electricity meter readings and diesel generator fuel used/delivered to site).
- Water consumption (i.e. water meter readings or bowser water deliveries to site).
- Waste collections.
- Heavy Duty Vehicles entering/leaving site.

The Principal Contractor shall comply with any additional reporting requirements that may be introduced through the conditions of any agreements or permits.

6.5 Review and updates

6.5.1 CEMP Reviews

The site wide CEMP will be reviewed every 6 months as a minimum; or following any significant change to the work activities, client requirements or legislation. Therefore, this CEMP is a live document and will be continuously updated as required.

6.5.2 Management Review

A management review of the performance of the Environmental Management System will be undertaken at least every 6 months and will include the Clients Project Manager and senior management (as a minimum this should include the Project Director, HSEQ Manager and senior corporate representative) key personnel including the Environmental Manager.

Matters such as staffing, training, matters arising from audits and inspections and performance against KPIs will be discussed and where there is a shortfall in performance, actions shall be agreed to rectify this.

6.6 Legal and other requirements

Certain aspects of the construction work for this Project may be subject to environmental permits, consents, authorisations and permissions.

6.6.1 Environmental Consents Register

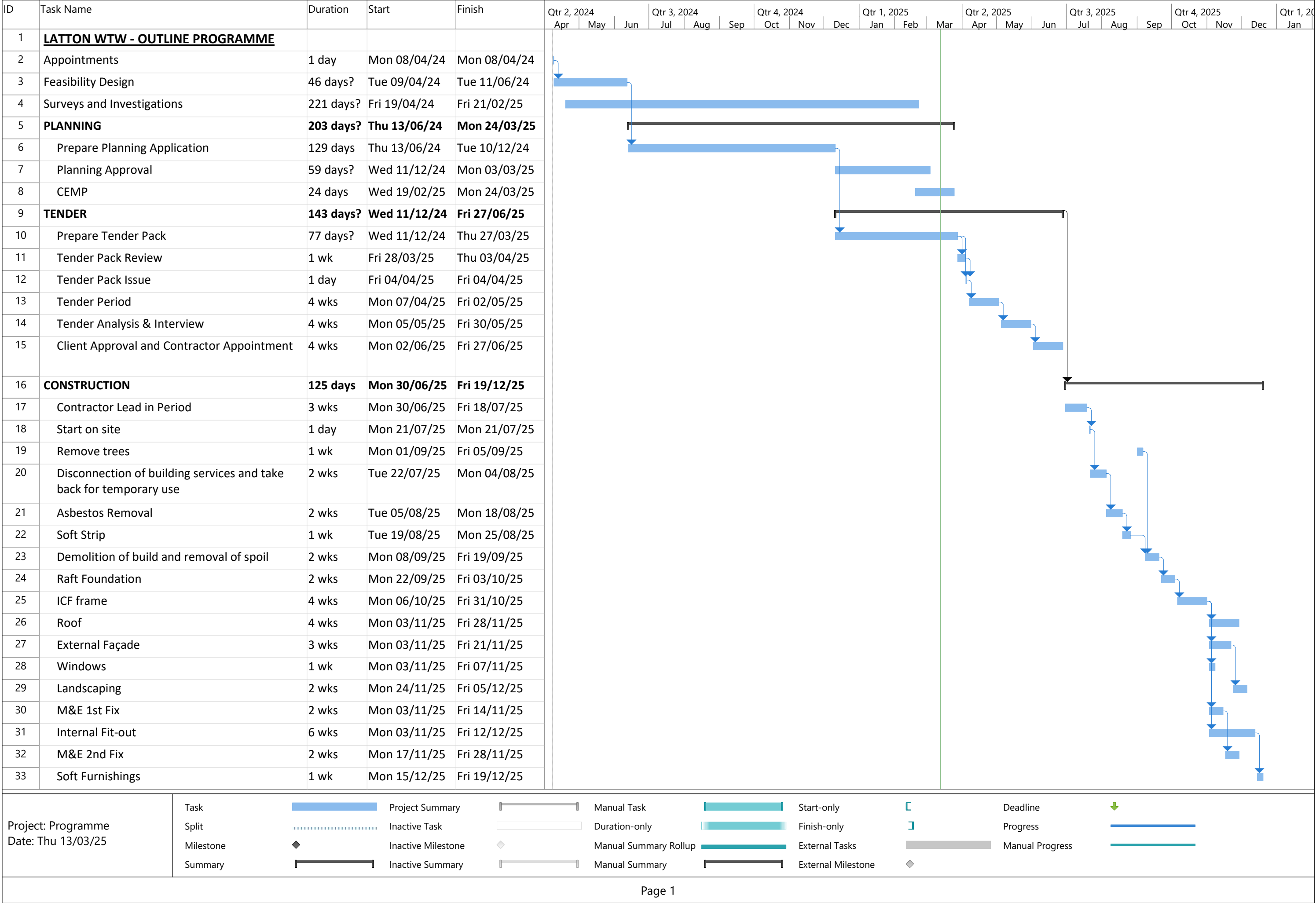
The Environmental Consents Register includes a schedule of all consent submissions and a tracker to confirm they are in place for the start of works.

The register is a live document and shall be reviewed monthly. The Site Manager will be responsible for ensuring resources are available and work is planned to meet the legislative requirements.

An outline Environmental Consents Register is attached as Appendix 4.

APPENDIX 1

OUTLINE PROGRAMME



APPENDIX 2

ENVIRONMENTAL MANAGEMENT MATRIX

Environmental Management Matrix

Rev00

ACTIVITY	ASPECT	IMPACT	MITIGATION	WHO	FREQUENCY
Mobilisation/ site clearance and compound set-up					
Site establishment	Water quality	Works affecting watercourses	No works (in, over, under) will be undertaken within 20m of a watercourse bank without technical environmental advice regarding the requirement for a permit. Works can only proceed once appropriate mitigation (within technical environmental advice or permit conditions) has been installed and all conditions met.	Site Manager/ SHE Manager	Pre-construction planning
	Flora and fauna	Removal of habitat and disturbance to wildlife	Works will not commence until an Ecological Appraisal has been completed and appropriate mitigations have been implemented. If during work activities it is suspected that a protected species has been disturbed, all works in the immediate area must cease until a qualified ECoW attends the site.	Site Manager/ SHE Manager	Pre-construction planning
	Archaeology	Disturbance of archaeology	No ground intrusive works shall commence until an Archaeological Appraisal has been completed and appropriate mitigations have been implemented.	Site Manager/ SHE Manager	Pre-construction planning
	Public Rights of Way	Closure/ diversion of Public Rights of Way	Public Rights of Way (PRoWs) shall remain open where possible. Applications for consent for any closures / diversions to existing PRoWs will be obtained and agreed with the local authority in advance of the required works. Advance provision of clear signs to indicate the reasons for, and duration of, the closure or diversion. Provision of adequate advance notification of any closure or diversion at car parks along the route and popular starting points for walkers, along with notices to walking clubs and ramblers' websites etc. Reinstating footpaths and bridleways/PRoWs fully on completion of construction and restoration works (to the satisfaction of the relevant rights of way officer).	Site Manager/ SHE Manager	Pre-construction planning
Hazardous material storage and use	Release to water/ groundwater/ land	Polluting environment	Storage and handling of hazardous substances (including fuels) should not occur within 10 metres from any inland freshwater or coastal waters, or within 50 metres from a well or borehole. The secondary containment system must provide storage for at least 110% of the tank's maximum capacity and ensure that any valves, filters, sight gauges, vent pipes or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges would be contained. Fuel tanks, secondary containers and storage compounds shall be inspected monthly for damage, corrosion, leaks, faults and vandalism. Repair defects/faults immediately and retain records. All hazardous materials shall be labelled, sealed and stored with their COSHH assessment in a bunded and lockable container away from drains and watercourses when not in use. Hazardous liquids shall be transferred using a funnel and drip tray and sealed and returned to the container immediately after use. Damaged containers shall be reported to the Site Manager. Fully lockable and labelled 'Fuel Safe Static Tank' will be deployed. All drains located adjacent or near to refuelling points shall be covered by Gully Guards before commencing transfer. All fuel transfers to be supervised. Where possible, refuelling should only be carried out in a designated area, which will be secured/locked out of hours. Suitable and sufficient spill kits shall be provided. Note: for sites close to water courses and drains, enhanced spill kits must be provided . Spill kit supply to be monitored weekly to ensure adequate stock remains full.	Snr Foreman	Weekly

Site establishment	Local issues (nuisance)	Visual intrusion	Cabins and site facilities will be placed, where possible, out of line-of-sight of local residents. Maintain good housekeeping and site working practices to control litter, insects or vermin. For example, dispose of food into appropriate receptacles. The site shall be set up with hoarding to reduce dust leaving the site. The site boundary shall be secured appropriately and all site gates shall be kept locked / closed out of working hours and kept closed and /or manned during working hours. Wherever possible, lighting shall be located and directed so that it does not cause unnecessary intrusion to local residents. Lighting shall be switched off when not in use unless specifically needed for construction activities or for security and / or health and safety requirements. Glare (and the potential for complaints) caused by poorly directed security and floodlighting shall be minimised by ensuring that light fittings are horizontally mounted and directed inwards on Site. Post-installation checks and monitoring of the lighting installations shall be undertaken to ensure that correct tilting angles and appropriate direction of lighting is achieved. This will allow adjustments to be made, where practicable, should undue light spill or glare be identified.	Site Manager/ SHE Manager	Weekly
Site operations/ use of plant and equipment		Noise impact to local residents	Local Authority consent must be obtained for particularly noisy activities before starting works. For example, crushing and piling. Contractors and operatives must be informed of consent conditions. Noisy works and deliveries to and from the site shall be conducted within the core working hours. Where necessary, deliveries outside of these core hours would be agreed in advance with the local authority. Plant shall be selected with noise levels in mind and it is important that quiet or silent plant is used. If possible, electrically powered plant should be used. All plant shall be suitability maintained and noise screens shall be used where required. Use generators having a sound power level rating below 65db(A), fully canopied and silenced. To assist with noise attenuation, where possible, generators will be located away from adjacent residents, also taking account of prevailing wind conditions. Position exhausts away from site boundaries and occupied areas when in use. All generators (and other noisy plant) shall be switched off overnight and when not in use. If heat is needed for drying rooms this should be provided via storage type heaters.	Site Manager/ SHE Manager	Pre-construction planning
Deliveries and work force travel	Traffic and transport	Traffic affecting local residents	Effective traffic management will be planned and implemented, where required in agreement with the Local Authority. Sufficient parking arrangements will be provided for site staff, to prevent parking on the side of the road.	Site Manager/ SHE Manager	Pre-construction planning
Deliveries and work force travel. Use of plant and equipment.	Air emissions	Exhaust fumes affecting local residents/ environment	All equipment shall be inspected before use and any defects/faults reported to the Site Manager. All vehicle engines will be switched off when not in use to reduce particulate emissions. Exhaust systems will be fitted with particulate filters and catalytic converters as necessary.	Snr Foreman	Daily
Site operations	Waste management	Lack of suitable facilities leading to increased landfill	A waste collection area shall be set up before site works start. This area shall be as close to the site compound as possible with adequate hardstanding for the waste containers and unobstructed access for telehandler and waste removal vehicles. A waste management plan shall be made available on site and its requirements understood by all Contractors and operatives before starting work on site. Monthly updates on the amount of waste successfully recycled will be made available to the Site Manager and displayed in the site office and can also be issued to the council upon request.	Site Manager/ SHE Manager	Pre-construction planning/ Monthly
	Use of natural resource	Depletion of natural resources	Mains electricity shall be used where available. If unfeasible, generators are to be used and must be sized for the required output; if diesel they must be set up by the supplier.	Site Manager/ SHE Manager	Pre-construction planning
Groundworks					

Topsoil stripping/ excavations	Soil management	Mixing of soil strata and loss of structure	A soil management plan will be developed detailing procedures for soil handling, storage and transfer (aligned to CIRIA Guidance: Sustainable management of waste soils and aggregates (RP1124)). The site works shall be designed to retain as much soil on site as possible whilst maintaining protection of human health and the environment. Excavated material surplus shall be minimised so far as practicable. Stockpiles shall be covered, seeded or fenced (as appropriate) to prevent wind whipping.	Site Manager/ SHE Manager	Pre-construction planning
	Flora and fauna	Removal of habitat and disturbance to wildlife.	Works will not commence until an Ecological Appraisal has been completed and appropriate mitigations have been implemented. If during work activities it is suspected that a protected species has been disturbed, all works in the immediate area must cease until a qualified ECoW attends the site.	Site Manager/ SHE Manager	Pre-construction planning
	Archaeology	Disturbance of archaeology	Groundwork activities will not commence until an Archaeological Appraisal has been completed and appropriate mitigations have been implemented.	Site Manager/ SHE Manager	Pre-construction planning
	Land contamination	Disturbance of contaminated ground	Known areas of contaminated land will be managed according to a method statement provided by a technical specialist. Where unknown contaminated land is disturbed, works will cease until analysis is completed by a technical specialist and appropriate mitigations have been implemented. Stockpiles of contaminated material must be situated on an impermeable surface at least 10m from any surface waters or drains, and run-off collected within a bund. Potentially contaminated water must be tested before dewatering. Contaminated water must be treated or discharged off site using an appropriate waste permit.	Snr Foreman/ SHE Manager	Pre-construction planning/ daily
	Release to water	Silt run-off/ excavation dewatering entering watercourses and affecting aquatic life	Minimise any areas of soil stripping and stockpiling. Surface water and drains must be protected from silt run-off (e.g. silt fences/ bunds/ french drains) to prevent silt laden water from entering them. All silt protection measures must be inspected weekly and maintained throughout the works. Tracking or washing out next to drains/surface waters must be avoided. Permit to Pump to be used to remove water from excavations, aligned to statutory guidance. If a discharge consent is required, then all conditions within the consent must be understood before commencement of dewatering. If necessary temporary bunding and/or settlement ponds will be installed to allow for isolation and onsite treatment of any sediment laden or contaminated water prior to managed discharge. Vehicle washdown facilities shall be appropriately managed to contain contaminants and regulate reuse or disposal of the water.	Snr Foreman	Daily
	Water quality	Works affecting watercourses	No works (in, over, under) will be undertaken within 20m of a watercourse bank without technical environmental advice regarding the requirement for a permit. Works can only proceed once appropriate mitigation (within technical environmental advice or permit conditions) has been installed and all conditions met.	Site Manager/ SHE Manager	Pre-construction planning
	Local issues (nuisance)	Dust generation potentially smothering crops or plants/ affecting local residents	Site layout shall be planned so that machinery and dust causing activities are located away from receptors, as far as is possible. Where foreseeable and significant dust is to be generated during an operation, dust fencing and/or barriers must be provided to minimise impact. Timing of earthworks and material movements shall be planned to reduce double handling and minimise traffic movements and therefore associated dust and mud. If dust levels remain excessively high when adequate control measures are in place and operating effectively, then reduce or postpone works during such times (e.g. during dry or windy periods).	Snr Foreman	Daily

Deliveries and work force travel. Use of plant and equipment.	Air emissions	Exhaust fumes affecting local residents/ environment	All equipment shall be inspected before use and any defects/faults reported to the Site Manager. All vehicle engines will be switched off when not in use to reduce particulate emissions. Exhaust systems will be fitted with particulate filters and catalytic converters as necessary.	Snr Foreman	Daily
Muck-away and deliveries	Traffic and transport	Wagon movements affecting local residents	Effective traffic management will be planned and implemented, where required in agreement with the Local Authority.	Site Manager/ SHE Manager	Pre-construction planning
		Mud/ dust on road affecting local residents	Wash facilities for vehicular use located close to the site entrance shall be connected to an offline gully and trap system located within the site boundary. Haul routes shall be hard surfaced and/or effectively damped down and shall be kept clear of soil as much as possible. All vehicles carrying soil off-site must be sheeted. All vehicle engines will be switched off when not in use to reduce particulate emissions. Mechanical road sweepers shall be employed to clean roads of any dust and debris if it is generated within the vicinity of the site entrance.	Snr Foreman	Daily
Establishing haul roads/ hard-standings	Use of natural resource	Depletion of natural resources	The environmental impact of materials will be considered in the procurement process. Ordered materials shall be managed to avoid over-ordering or spoilage of surplus materials. Surplus materials are to be reused on site where possible.	Project Manager/ Site Manager	Pre-construction planning/ monthly
Civils					
Laying concrete foundations/ floorings etc	Use of natural resource	Depletion of natural resources	The environmental impact of materials will be considered in the procurement process. Ordered materials shall be managed to avoid over-ordering. Surplus materials are to be reused on site where possible.	Project Manager/ Site Manager	Pre-construction planning/ monthly
	Release to water/ groundwater/ land	Concrete wash-out water incorrectly treated and disposed of, polluting receiving environment	All drains adjacent or near to concreting works shall be covered with Gully Guards before commencing mixing. Concrete wagons should be instructed to not wash-out onsite. A designated wash-out container will be provided to clean the delivery chute. Concrete washings must be treated and tested prior to discharge onsite. RPS 235 'Treating and using water that contains concrete and silt at construction sites' provides further guidance.	Snr Foreman	Daily
Concrete wagon movements	Traffic and transport	Wagon movements affecting local residents	Effective traffic management will be planned and implemented, where required in agreement with the Local Authority.	Site Manager/ SHE Manager	Pre-construction planning
		Mud/ dust on road affecting local residents	Wash facilities for vehicular use located close to the site entrance shall be connected to an offline gully and trap system located within the site boundary. Haul routes shall be hard surfaced and/or effectively damped down and shall be kept clear of soil as much as possible. All vehicle engines will be switched off when not in use to reduce particulate emissions. Mechanical road sweepers shall be employed to clean roads of any dust and debris if it is generated within the vicinity of the site entrance.	Snr Foreman	Daily
Piling	Local issues (nuisance)	Noise and vibration affecting local residents	Employ rotary piling techniques where possible. Position piling rigs away from local residents, so noise is emitted away from them. Install acoustic sleeves around the piling hammer to contain the noise.	Site Manager	Pre-construction
Build and fit-out					

Procurement and material management	Housekeeping	Poor management of materials leading to wastage	The environmental impact of materials will be considered in the procurement process. Ordered materials shall be managed to avoid over-ordering or spoilage of surplus materials. A storage compound will be developed to safely store materials to prevent damage from traffic and weather. Surplus materials are to be reused on site where possible. Surplus dry (powder) concrete, cement and grout is to be collected and reused where possible e.g. as inert rubble. Reuse of dried materials may require environmental permits or exemptions. Encourage the reuse of cut-offs and arrange for suppliers to take back unused surplus materials and packaging. All reuse and recycling to be carried out in accordance within the terms of a valid waste exemption or voluntary codes of practice/protocols. Hazardous liquids must be re-sealed after use. Empty containers are to be disposed of to the designated container within the waste compound.	Project Manager/ Site Manager/ Snr Foreman	Pre-construction planning/ monthly/ weekly/ daily
Use of plant and equipment	Air emissions	Exhaust fumes affecting local residents/ environment	All equipment shall be inspected before use and any defects/faults reported to the Site Manager. All vehicle engines will be switched off when not in use to reduce particulate emissions. Exhaust systems will be fitted with particulate filters and catalytic converters as necessary.	Snr Foreman	Daily
Block cutting/ aggregate deliveries etc	Local issues (nuisance)	Dust generation potentially smothering crops or plants/ affecting local residents	Where feasible the site or specific operations shall be fully enclosed where there is a high potential for dust production and the site is active for an extensive period. Drop heights must be kept to a minimum and conveyors and enclosed wherever possible.	Snr Foreman	Daily
Deliveries and work force travel	Traffic and transport	Wagon movements affecting local residents	Effective traffic management will be planned and implemented, where required in agreement with the Local Authority.	Site Manager/ SHE Manager	Pre-construction planning
		Mud/ dust on road affecting local residents	Wash facilities for vehicular use located close to the site entrance shall be connected to an offline gully and trap system located within the site boundary. Haul routes shall be hard surfaced and/or effectively damped down and shall be kept clear of soil as much as possible. All vehicles carrying soil off-site must be sheeted. All vehicle engines will be switched off when not in use to reduce particulate emissions. Mechanical road sweepers shall be employed to clean roads of any dust and debris if it is generated within the vicinity of the site entrance.	Snr Foreman	Daily
Waste management					
	Duty of Care	Non compliance to legislation	Wastes shall be collected by a licenced waste carrier. A copy of all Waste 'Duty of Care' documentation shall be held on site. Duty of Care documentation must be completed for all waste transfers and copies provided to the Client every week. Waste transfer notes or hazardous waste consignment notes and Duty of Care procedures are to be audited regularly (monthly as a minimum). Soil and recycled aggregate transfers shall be carried out in accordance with an approved Materials Management Plan (or Remediation Strategy in Scotland) and all transfer tickets must be retained on site.	Site Manager/ SHE Manager	Monthly/ Weekly/ Daily

Waste management	Segregation	Cross contamination of materials	Where possible, all waste shall be segregated on site. Skips shall be provided to segregate wastes including plasterboard, timber and metal. A designated area shall be provided for inert wastes, for example bricks, clay pipes and roof tiles. A designated container[s] shall be provided for hazardous wastes, which and must be clearly labelled. Hazardous waste streams must be segregated and stored in accordance to their safety data sheets. All road sweepings must be removed from site accompanied with a completed waste transfer note from the driver. If road sweepings are inadvertently discharged on site, these should be disposed of appropriately. All plasterboard waste shall be segregated on site and returned for recycling (e.g. to British Gypsum). All timber is to be segregated on site and sent to a local charity (or similar outlet) for recycling. All metal is to be segregated on site and sent for recycling. All inert waste (e.g. bricks, blocks, concrete) will be segregated on site and used under roads, driveways etc (this may require environmental permits or exemptions). All mixed waste removed from site shall be taken to a material recycling facility for further segregation to maximise recycling and recovery.	Site Manager/ Snr Foreman	Pre-construction planning/ Weekly
Demobilisation					
Demobilisation	Traffic and transport	Wagon movements affecting local residents	Effective traffic management will be planned and implemented, where required in agreement with the Local Authority.	Site Manager/ SHE Manager	Pre-construction planning
		Mud/ dust on road affecting local residents	Wash facilities for vehicular use located close to the site entrance shall be connected to an offline gully and trap system located within the site boundary. Haul routes shall be hard surfaced and/or effectively damped down and shall be kept clear of soil as much as possible. All vehicles carrying soil off-site must be sheeted. All vehicle engines will be switched off when not in use to reduce particulate emissions. Mechanical road sweepers shall be employed to clean roads of any dust and debris if it is generated within the vicinity of the site entrance.	Snr Foreman	Daily

APPENDIX 3

INCIDENT RESPONSE



Incident Response

1 OIL, FUEL OR CHEMICAL SPILL

1.1 To ground

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/ valve, correct leaking drum and make safe the area.
- ii. If the spill is migrating, create a temporary bund to prevent further spread by using spill kit materials / sandbags.
- iii. If drains or field ditches are located nearby, install drain seals/ deploy additional spill kit materials to prevent the spill discharging to the drain or ditch.
- iv. Apply absorbent granules or pads (available from spill kit) to the affected area.
- v. The Contractor will notify the Environment Agency regarding the nature and scale of incident. The following information should be included in the notification:
 - Time of discharge;
 - Type/quantity of material discharged;
 - Location of discharge; and
 - Site contact details.
- vi. The Contractor will notify the Client of the incident and communicate the information provided to the Environment Agency.
- vii. The Client will notify the Local Planning Authority regarding the nature and scale of the incident as per the requirements of the Environmental Damage (England and Wales) Regulations 2015.
- viii. Containment measures should remain in place until the nature and extent of the contamination can be assessed and a remediation strategy must be prepared.

All impacted materials shall be disposed of in accordance with relevant legislative and regulatory requirements and the Duty of Care requirements outlined in the CoCP.

1.2 To surface water feature

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/ valve, correct leaking drum and make safe the area.
- ii. If source not readily identifiable, contain first (see below) then identify and prevent further release at source.
- iii. Immediately deploy appropriate sized boom from nearest spill kit across affected surface water feature. Use stakes to attach it to the sides of the surface water feature. Tie booms together to increase length if required.
- iv. Supplement with additional booms across the surface water feature, as required, to contain any migration of the spill not halted by the first installation.
- v. The Contractor shall notify the Environment Agency regarding the nature and scale of incident. The following information should be included in the notification:
 - Time of discharge;



- Type/quantity of material discharged to surface water feature;
 - Location of discharge; and
 - Site contact details.
- vi. The Contractor shall notify the Client of the incident and communicate the information provided to the Environment Agency.

All impacted materials will be disposed of in accordance with relevant legislative and regulatory requirements and relevant Duty of Care requirements.

1.3 To drainage system

- i. Wearing protective clothing, prevent further release at source e.g. switch off tap/ valve, correct leaking drum and make safe the area.
- ii. If source is not readily identifiable, contain the visible pollutant first, then identify and prevent further release at source.
- iii. Immediately deploy appropriate drain cover(s) to affected gullies.
- iv. Supplement with booms around the gully to contain any migration of the spill.
- v. The Contractor shall notify the Environment Agency and the relevant water company regarding the nature and scale of incident. The following information should be included in the notification:
 - Time of discharge;
 - Type/quantity of material discharged to the drain;
 - Location of discharge, specifically which drain; and
 - Site contact details.
- vi. The Contractor shall notify the Client of the incident and communicate the information provided to the Environment Agency.

All impacted materials shall be disposed of in accordance with relevant legislative and regulatory requirements and relevant Duty of Care requirements.

2.1 Discovery of unexpected contamination

- i. On the discovery of unexpected contamination, the Contractor will immediately halt works in the area.
- ii. If impacted materials have already been removed they shall be returned to the excavation or placed on to a membrane, e.g. terram, to prevent migration of the contaminant to another area.
- iii. Contractor to report the situation to the Client.
- iv. Arrangements will be made between the Contractor and the Client for samples of the contamination to be collected and tested on fast turnaround.
- v. Contractor to only continue with works in the area once the test results have confirmed the contaminant and a safe means of working has been established.

The Contractor shall be free to continue works in areas unaffected by the contamination, BUT the Contractor will not speculatively continue to excavate material to find the extent of the contamination without supervision from a geo-environmental engineer.

All impacted materials will be disposed of in accordance with relevant legislative and regulatory requirements as well as relevant Duty of Care requirements.

2.2 Contamination of or by waste materials

- i. Assess whether the area needs to be evacuated, such as if fumes are being given off.
- ii. Assess whether the damage can be undone through segregation.
- iii. Complete a risk assessment for the task including consideration of any COSHH risks.
- iv. If it is safe to do so segregate the waste. If it is not safe to do so, then the full waste quantity is to be consigned as hazardous waste.
- v. Contractor to report the incident to the Client.
- vi. Waste to be collected from site in accordance with normal practice.



3 DISCOVERY OF ARCHAEOLOGICAL ARTEFACT OR HERITAGE FEATURE

- i. Immediately stop works in the area of the artefact or feature.
- ii. Ensure the area is isolated from interference by erecting fencing around the discovery. Prevent vehicles from navigating through this area.
- iii. Provide a safe means for pedestrians; and if possible vehicles, to move around the isolated area.
- iv. Contractor shall report the find to the Client.
- v. Client to arrange for the find to be assessed by a qualified heritage or archaeological specialist. The Contractor is to prevent tampering with the find until it has been assessed.
- vi. Works to proceed in accordance with the recommendations given by the heritage or archaeological specialist.

In the event of an unexpected discharge of silty water, then:

- i. Prevent further release at source e.g. cease dewatering the excavations.
- ii. Contain silt and protect sensitive receptors from further discharge:
 - If a drain is located nearby, install drain seals or deploy spill kit materials to prevent discharge.
 - If silt flow is in the direction of surface water features deploy hay bales around surface the feature.
 - If silt is being generated by runoff from stockpiles deploy spill kit materials, silt fencing or move soil to form a bund at the base to prevent further silt laden runoff from the stockpile.
- iii. If silt is discharged without prior approval the Environment Agency shall be notified. If the silt discharge enters the drainage system the relevant water company shall also be notified regarding the nature and scale of incident. The following information should be included in all notifications:
 - Time of discharge;
 - Type/quantity of material discharged;
 - Location of discharge, e.g. which drain or surface water feature; and
 - Site contact details.



5 COMPLAINT OVER A NUISANCE

This procedure should be followed for all nuisance complaints including noise, dust and light.

- i. Immediately stop the activity leading to the complaint; or where not possible to entirely stop the activity reduce it to the lowest possible level e.g. shut off all non-essential plant.
- ii. Remain polite and courteous. If able to resolve the issue through discussion with the complainant, then determine what action is needed and put it into practice.
- iii. Record the details of the complainant including their name, contact details and address. Contractors shall report the details of the complaint and the complainant to the Client.
- iv. The Contractor and the Client will register the complaint on the Complaints Log.
- v. The Client will act on the complaint and remedial actions will be put in place within 24 hours.



6 ECOLOGICAL DISCOVERY OR DAMAGE

- i. Immediately stop works in the area.
- ii. Contractor to immediately report the incident to the Client.
- iii. Client to arrange for a qualified ecologist to assess the discovery or damage caused.
- iv. Works to proceed in accordance with the advice received from the ecologist.

7 VANDALISM/THEFT PROCEDURE

Acts of theft and vandalism present the risk that damage may be caused to equipment containing hazardous substances that could cause pollution, or damage may be caused to measures which have been installed to prevent the release of pollution. On identifying an act of vandalism or theft:

- i. The Contractor shall notify the Police of the incident.
- ii. Inspect all fuel storage tanks/drums and equipment to ensure there has been no release of the fuel or other hazardous substances, e.g. hydraulic fluid.
- iii. If a spill is identified follow the procedures for Oil, fuel or chemical spills.
- iv. Inspect pollution protection measures, e.g. drainage or silt protection, to ensure it has not been interfered with. Where it is possible, correct any issues identified without causing further release.
- v. Inspect site boundaries to identify the access point if not immediately clear and secure the site.

Explosion/fire incidents should also be dealt with through health and safety procedures. In the event that a fire is detected or an explosion occurs:

- i. Notify the emergency services and evacuate the area.
- ii. Attempt to tackle the fire with site equipment only when it is safe to do so.
- iii. Ensure that pollution of nearby water bodies including surface water drainage from fire control water or other substances is minimised. Where possible and safe to do so, any site drainage systems should be protected through the deployment of drain seals/ spill kit materials to ensure any firefighting waters are captured and can be disposed of appropriately.
- iv. At a time when it is acceptable to do so, the Environment Agency shall be notified regarding the nature and scale of incident. The following information should be included in the notification:
 - Nature of the incident;
 - Time and date of the incident;
 - Quantity of fire control water discharged to surface water feature/drainage, where relevant;
 - Location of discharge; and
 - Site contact details.

APPENDIX 4

ENVIRONMNETAL CONSENTS REGISTER

	Environmental Consents	Revision:	Date:
Site Location:	Latton Water Treatment Works (WTW)	1	7/4/2025
Site Description:	Latton WTW, Cirencester Road, Down Ampney, Cirencester, GL7 5QN		
Project Manager	Nick Solanki		
Consent reference	Item	Status	Responsibility
ABC/123	Section 61	Open	Snr Foreman
DEF/456	Water abstraction exemption	Open	SHE Manager