



# CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN

AT

Heol y Glyn, Glyn-neath  
Neath Port Talbot SA11 5AU

Date	Brief Summary of Changes	Reviewed By
17/12/19	New Issue	S Anderson
31/07/20	Amendment 1	S Anderson
18/08/20	Amendment 2	S Anderson
26/08/20	Amended to include reference to Amphibian & Reptile Mitigation Strategy/Working Method Statement	S Anderson
31/08/20	Detailed Site Compound & Watercourse Mitigation Measures	S Anderson
24/09/20	Spoil Heap Removal Measures	S Anderson

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## 1.1 Introduction

This construction environment management plan (CEMP) has been prepared on behalf of Enzo's Homes Ltd as supporting information to assist with the discharge of Pre-App. Ref.: Q2019/5053, a Non-Statutory Pre-Application Advice for Section 73 revisions to Planning Permission P2010/0562 for 80 dwellings and associated works at Heol y Glyn, Glynneath, Neath Port Talbot, SA11 5AU.

The proposed development will provide 80, residential properties and associated works on land at Heol y Glyn, Glynneath, Neath Port Talbot, SA11 5AU.

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

We do not foresee any elevated noise levels above what would be considered typical during construction operations. We consider the measures put in place to carry out the works, to best practicable means, to be requisite and therefore negate the need to serve a Control of Pollution Act 1974 (Section 61) Notice.

## 1.2 Project Summary and Phasing

The project consists of construction of 80 residential properties together with associated access, car parking and landscaping. The project will be made up of three phases;

Phase 1 to include 21 no residential properties to include a Silt Pond (day 1), as identified, to the rear of Plot 59 and highway throughout the site. Drainage works and the culverting of the existing watercourse to a point just short of the proposed connection point to the SW of plot 59 on the Sauro layout plan. A purpose built silt pond will be proposed as a final point prior to formal discharge into the existing connection point to the SW. Expected timescale 11 months.

Phase 2 to include 27 no residential properties serviced by the pre-built infrastructure from Phase 1, estimated timescale 12 months.

Phase 3 to include 32 no residential properties, Plot 59 will be the final plot to be completed on the site as a result of the silt pond being present and needed until the culvert is officially connected to the existing connection point as per the drainage plan, estimated timescale 11 months

- **App. 1**      **Architects Drawing**
- **App. 13**    **Phasing Layout Plan**

## 1.3 Purpose of this Document

The purpose of this CEMP is to outline how Enzo's Homes Ltd construction scheme will avoid, minimise or mitigate effects on the environment and surrounding area.

This CEMP is an 'Active' document which will be subject to continuous review and updating at regular intervals throughout the project life cycle.

## 1.4 Roles and Responsibilities

Principle Contractor: **Enzo's Homes Ltd**,  
Office 3 Block B Lllys y Barcud,  
Clos Gelliwerdd,  
Cross Hands Business Park  
Llanelli  
SA14 6RX

**Contact: Mr E Sauro**

**Telephone: 01269 597155**

Enzo's Homes Ltd is responsible to ensure that all members of the Project Team, including sub-contractors, comply with the procedures set out in this CEMP. Enzo's Homes Ltd will ensure that all persons working on the construction site are provided with sufficient training, supervision and instruction to fulfil this requirement.

Enzo's Homes Ltd will ensure that all persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

The key staff identified as having environmental responsibilities are as follows:

**A. Head of Environment**

The responsibilities of the Head of Environment include but are not limited to:

- Maintaining environmental records;
- Providing guidance for the site team in dealing with environmental matters, including legal and statutory requirements affecting the works;
- Reviewing environmental management content of method statements;
- Reporting environmental performance to the Site Manager;
- Liaison with statutory and non-statutory bodies and third parties with an environmental interest in the scheme.

**B. Site Manager**

The Site Manager's environmental management responsibilities include but are not limited to:

- Preparation and implementation of the CEMP;
- Close liaison with the Head of Environment, as Environmental Co-ordinator, to ensure adequate resources are made available for implementation of the CEMP;
- Implementation of the Site Waste Management Plan (SWMP Co-ordinator)
- Ensuring that the risk assessments for control of substances hazardous to health regulations (COSHH), noise and environmental risk are prepared and effectively monitored, reviewed and communicated on site; and
- Managing the preparation and implementation of method statements. Ensuring that the Head of Environment reviews all method statements and that relevant environmental protocols are incorporated and appended.

**C. Engineering Staff**

The engineers' environmental management responsibilities include but are not limited to:

- Reporting any operations and conditions that deviate from the CEMP to the Site Manager;
- Taking an active part in site safety and environmental meetings; and
- Ensuring awareness of the contents of method statements, plans, supervisors' meetings or any other meetings that concern the environmental management of the site.

**1.5 Site Induction**

All personnel involved in the scheme will receive an environmental awareness induction. The environmental awareness procedure will ensure that all staff are familiar with the principles of the CEMP, the environmental aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures.

**1.6 Consultation and Communication**

*Statutory and Non-Statutory Bodies*

During the construction works, communication will be required with external parties such as statutory authorities, interest groups and the public. Communication may take the form of scheduled meetings, site visits and written correspondence.

**Public**

The Site Manager shall ensure that the public is kept informed of operations that may have an effect on them. This may involve letter drops and meetings to keep local residents and nearby private/public services informed. The Site Manager will provide details of contacts within the project team for the public to contact should any issues arise.

### **Statutory Consents, Licences and Permits**

The Principal Contractor will ensure that any licences required are in place prior to works commencing.

### **Environmental Alerts**

Legislative changes or proposed improvements to manage processes on site or other consultations will be communicated by the Site Manager to Enzo's Homes Ltd.

### **Meetings and Records**

Environmental issues relevant to the project will be discussed during Site Progress Meetings which will be attended by the Site Manager and Head of Environment, (if required). Environmental performance will also be discussed at regular health, safety and environmental meetings. This will include dissemination and discussion of the findings of audits, environmental reports and other inspections where appropriate.

### **1.7 Environmental Impacts and Mitigation**

- An updated Ecological Appraisal of the site was carried out in March 2020 by I&G Ecological Consulting. The report contains various recommendations regards steps to be taken to protect the species/habitats on site, these are further addressed within 7.1 of this CEMP.
- The Amphibian and Reptile Mitigation Strategy/Working Method Statement, prepared by Sian Musgrave, Amber Environmental Consultancy, August 2020 is further addressed in 7.1 of this CEMP
- Patches of Japanese Knotweed and Himalayan Balsam have been identified as growing on the site, a survey and mitigation plan is being carried out by South Wales Knotweed removal.
- There are a number of trees on site under an original Tree Preservation Order, 10<sup>th</sup> August 1990, as such a Tree Survey is being carried out by David Rice Forestry.
- Archaeology Wales will provide services to the Archaeological Watching Brief as agreed under the previous planning application P2010/0303.

### **2.1 Scope and Objectives**

The objective of this CEMP is to ensure prevention of pollution to land, air or water and compliance with current environmental legislation, and to provide a benchmark for best practice such that all possible preventative measures will be taken to avoid pollution of land or the water environment during construction works.

### **3.1 Definitions & Potential Pollution Sources**

Pollution may be defined as the introduction of a contaminant into air, land or water, resulting in an impact to the ecosystem into which the substance is released.

Pollution may arise as a result of poor planning and implementation of management procedures associated with traffic, plant and materials handling, waste management, surface water and drainage management, and concrete management. An environmental incident which pollutes the local environment will typically be, but not be limited to, the following examples:

- Minor oil spills away from watercourses;
- Not working in accordance with specific environmental procedures designed to prevent pollution during the works;
- An event (one-off) or series of events which contribute towards causing the environmental harm i.e. silting up of the adjacent beach and sea, oil spillage leading to the adjacent watercourse etc.
- A breach of consent conditions.
- The issue of a statutory enforcement notice by the Local Authority or Natural Resources Wales.

There are a number of potential sources of pollution from the construction works which may adversely impact upon both terrestrial and aquatic ecosystems:

- Run-off from exposed ground, excavations and material stockpiles;
- Cement and cement wash from concrete batching plants, storage areas and other areas where cement grout or concrete is being applied;
- Plant washing and vehicle wheel wash areas;
- Fuel and chemical storage/refuelling areas;
- Leaking / vandalised plant and equipment; and
- Sewage and wastewater from construction compound and permanent control building amenities.

Pollution from fuels, cement run-off, other chemicals and silt or other particulate matter can pose a significant risk to both terrestrial and aquatic habitats, potentially resulting in direct mortality of fish, invertebrates and vegetation as well as longer-term effects on freshwater ecology.

### **3.2 Site Specific Pollution Prevention Measures**

The Site Manager will be appointed to deal with complaints and enquiries. This individual will be named at the site entrance together with a contact telephone number. Enzo's Homes Ltd and our suppliers are committed to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce.

Enzo's Homes Ltd will ensure that sufficient numbers of spill kits will be strategically placed around the site, especially in areas identified as potential spillage locations. The location and contents of these spill kits will be checked daily by the Site Manager or delegated responsible individual (nominated person). Under no circumstances will any litter be allowed to be placed within the spill kits. The spill kits will be clearly labelled and the materials (contents) enclosed listed and kept up to date.

Also, a copy of the spill procedure (App. 4) will be included within the spill kit container and the Site Manager will also utilise a spill kit toolbox talk (App. 5) as a form of on the job training. Used materials from spill kits will be disposed of appropriately and replaced as a matter of urgency. Appropriate waste facilities will be available for contaminated materials. These waste facilities will be kept separated from any other non-contaminated wastes.

The emergency preparedness and response procedure (App. 6) will be followed in the event of an emergency on site. The emergency preparedness plan (App. 7) will ensure that relevant staff are aware of their responsibilities and the process to be followed in the event of a possible, probable or actual incident involving pollution into the watercourse.

The construction site will, where possible, use double bunded plant or equipment. Where double bunded plant or equipment is not available, there will be an additional method of containment to ensure no pollution or spillages occur. This may be in the form of plant nappies and/or drip trays. Where drip trays are used, suitable methods for emptying will be employed, such as with hand held pump and the contaminated water disposed of in a double bunded holding tank. The trays will be checked daily, (more during wet weather), to ensure no build-up of contaminated water overspill from the tray.

All bulk fuel tanks will be adequately protected to prevent major spillage in the event of hose failure or other equipment malfunction. The protection must include the use of sandbags and booms to create a protective barrier around the equipment.

Initial plant set-up will be checked. The amount of fuel in the tanks on arrival will be recorded. Only authorised personnel may have access to generator enclosures and they must be kept locked at all times.

The use of a wheel-wash facility will be provided, any sediment/waste material/water generated from this process will be collected in a bunded holding tank. The tank shall be regularly monitored and spoil pumped out and removed from site as necessary.

Plant or Vehicles requiring maintenance shall be worked on off site or, if applicable, in the designated impermeable area only.

All vehicles carrying waste away from the construction site must use covers to prevent any loss of load and additional dust.

The Site Manager will undertake weekly Health, Safety and Environmental Inspections to ensure the procedures listed above are being followed.

### **3.3 Pollution Prevention Measures**

The following points, (not exhaustive), indicate general pollution prevention measures that will be implemented:

- i) Any material or substance which could cause pollution, including silty water, will be prevented from entering surface water drains or watercourses by the propitious use of and appropriate placement of the bunded holding tank.
- ii) Any silty water generated on site will ideally be settled out as much as possible through drainage mitigation measures, (silt traps etc), and channelled into the holding tank to allow the settlement of solids.
- iii) All refuelling will be carried out in the designated compound which will be located as far away from the watercourse as is possible. Irrespective of the buffer distance and location of refuelling, drip trays and spill kits will be available in accordance with standard best practice across the construction industry.
- iv) Areas of waste, oil/fuel / chemical storage and permanent refuelling will be located as far away from the watercourse or drainage paths as is possible. Such storage areas will be appropriately sited to prevent the downward percolation of contaminants to natural soils and groundwater.
- v) Facilities for the storage of oils, fuels and/or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there are multiple tanks, the compound should be at least equivalent to the capacity of the largest tank or the combined capacity of interconnected tanks, plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipe work should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund
- vi) The Site compound, parking areas, turning areas and vehicle and equipment wash out areas are to be sited at least 30 metres from watercourses.
- vii) All waste and stockpiled materials will be stored, covered if necessary, in designated areas and isolated from any surface drains.
- viii) The use of a silt pond and silt buster, as necessary, will be employed to rear of Plot 59 until the culvert is completed.
- ix) A Personnel Site Induction will make specific reference to required pollution prevention measures as detailed in the guidance discussed above.
- x) All works will be carried out in accordance with best practice and will aim to prevent deterioration in the ecological status of surface waters and to avoid compromising the restoration potential of such waters.
- xi) In the event of a pollutant spillage on site, the material will be contained, (using an absorbent material).

### **3.4 Water Environment**

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

Site drainage and surface run-off contaminated with silt will not be allowed to directly enter any watercourse; as such, appropriate sedimentation and silt mitigation measures will be implemented on site in order to treat contaminated waters before being diverted to the holding tank for removal from site.

### 3.5 Construction Site Runoff

In the case of extreme rainfall, the clearance of vegetation, modifications to drainage infrastructure on the site, may lead to increased runoff above pre-construction rates. Enzo's Homes Ltd manages the risk of increased runoff during the construction phase by:

- Phased removal of surface vegetation at the appropriate construction phase
- The covering of stored materials
- Ensuring exposed soil is re-vegetated as soon as feasibly possible
- Protection of any storm water drain inlets

### 3.6 Dust and Air Quality

Dust will be generated during the construction works on site. The dust can be wind borne from ground surfaces or emitted from hand held percussive equipment and saws. As well as being a nuisance, dust is also a health and safety hazard particularly when inhaled. Enzo's Homes Ltd will ensure that where possible, dust extraction and suppression equipment is used to minimise the migration of dust through the project.

- A wheel-wash facility will be provided, any sediment/water generated from this process will be collected in an appropriate holding tank.
- Enzo's Homes Ltd will, when required, employ the use of a road sweeper to clean any affected area of the highway. Furthermore, local dust/mud/debris will be removed manually as the need arises to prevent such material causing contamination further on.
- Vehicles containing materials that could cause dust pollution will be sheeted when entering and leaving site.
- Construction traffic will be subject to a 5mph speed limit whilst moving around the site and a 'switch off engine' site rule to ensure no idling vehicles thus ensuring dust and exhaust emissions from lorries and plant are kept to a minimum.
- Vehicles leaving site shall be checked for cleanliness and if necessary be subject to wash down.

Modern construction equipment will allow the use of either suppressing (water) or extraction equipment (Class H or M extractor) to be fitted with water supplies. Construction plant, such as excavators do not have this facility and therefore manual suppression techniques will be employed.

Water needed for dust suppression during the demolition/construction activities and on the access road during periods of dry weather will be clean water. Dust suppression methods will be considered especially during dry periods. The methods must ensure dust cannot contaminate surrounding areas, cause pollution of watercourses or damage to any wildlife and ecology. Task-specific risk assessments will define areas as at risk of dust contamination. Suitable methods available would include the use of bowsters and/or micro spray systems. For control of dust on roads, all lorries will be covered, and use of road sweepers will be implemented where appropriate. Dust suppression techniques will be deployed at all times when dust is an issue during the works.

In addition to the above, Enzo's Homes Ltd will also implement the following:

1. Display the contact name for the person(s) accountable for air quality and dust issues on the boundary.
2. Display the regional or head office information on the boundary.
3. Record all dust complaints.
4. Make the complaints log available to the Council when asked.
5. Record any exceptional incidents that cause dust and/or air emissions and actions taken in the log book.
6. Ideally, dust stockpiles should not exceed height of site boundary screens and will be stored on site for the shortest period possible.
7. Carry out regular inspections to monitor compliance with the method statement.
8. An adequate supply of water for dust suppression must be provided.
9. Sweep the road in the event of track out problems.
10. Drop heights should be minimised.



11. There will be no burning of any materials at any time

### 3.7 Concrete Pollution Prevention Measures

Foundation excavations are generally below the level of the surrounding ground and therefore the risk of concrete spills to the existing base area is considered to be low. However, where the topography allows, foundation excavations are generally designed to be gravity draining in order to control ingress/egress of surface water from the excavation.

### 3.8 Concrete Wash Out

Wash out of concrete trucks will only be undertaken in designated areas. Designated wash out areas will be located away from any open watercourse, field drain or sensitive habitat area. No surface run-off from within the washout area will be permitted to leave the area and directly enter any drain or watercourse. Each wash out area should be located away from the main construction traffic area or access areas to prevent disturbance or tracking. A sign should be installed adjacent to each wash out facility to inform concrete equipment operators to utilise only the designated washout areas.

The number of wash out areas should be kept to a minimum.

At the designated washout areas, wash water will be contained within a lined skip which will undergo daily monitoring by the site manager and be subject to emptying and disposal.

When the temporary concrete washout facilities are no longer required for the work, the skip and any hardened concrete should be removed and disposed of to the designated landfill by licenced waste carrier.

### 3.9 Noise and Vibration Pollution

Working hours are as follows:

Monday to Friday	07:30 hrs –18:00 hrs
Saturday	07:30 hrs - 13:00 hrs (if required).

- Works are not permitted outside of the permitted times without prior agreement from the LPA. When work is required to take place outside of the normal working hours the LPA will be given a week's notice.
- Any works audible at the site boundary shall only be carried out between the hours of 08:00 – 18:00 and 08:00 – 13:00 on a Saturday.

Suitable methods will be undertaken to ensure the reduction of disturbance incl:

- Handling of materials, materials will be handled with care e.g. scaffolding, steels will be placed rather than dropped.
- Drop heights of materials from lorries and other plant will be kept to a minimum.
- Generators, compressors and pumps liable to create noise and/or vibration whilst in operation will, as far as reasonably practicable, be located away from sensitive receptors.
- All plant used on site will be maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable.
- As far as reasonably practicable, any plant, equipment or items fitted with noise control equipment found to be defective should not be operated until repairs have been carried out.
- Vehicles and mechanical plant, where reasonably practicable, will be fitted with effective exhaust silencers and will be maintained in good working order and operated in a manner such that noise emissions are controlled and limited as far as reasonably practicable.
- Use of low noise plant and good plant maintenance will be incorporated on site.
- The application of best practice with reference to BS 5228: 2009 will assist in minimising impact from construction noise and vibration.

- Erection of screening, if considered necessary through monitoring, this will consist of erecting local screening within the confines of the construction site. In addition, the construction site will also have a mixture of hoarding present to secure the site from unauthorised access, which will also reduce noise levels.

### **3.10 Hazardous Substances**

A full inventory of all hazardous substances, to be utilised on the project, which can contribute towards pollution will be populated at the start of the project and kept in the site file. This list will be updated as the construction project progresses. All hazardous substances will be appropriately stored as per manufactures guidance and in the allocated area. All hazardous substances also have the appropriate task-specific COSHH assessments which include the risk assessment and Safety Data Sheet/manufacturer instructions, to ensure minimal risk to any watercourses, wildlife and ecology.

The Construction (Design and Management) Regulations 2015 require the designing out of the use of hazardous substances. However, there will always be hazardous substances in use or required to be disturbed and these will be managed by reducing the quantities and applying basic safe system of works.

All hazardous materials are subject to risk assessment, method statement and COSHH risk assessments.

### **3.11 Emergency Response**

Environmental Incident and Emergency Procedures/Plans/Reports (App. 4 - 9) have been developed for the site. Pollution control related environmental incidents may include: spillages (oils and chemicals), contaminated or silty run-off entering a watercourse or water supply, flooding, riverbed or other aquatic habitat/species disturbance, damage to underground services, damage to habitats, poor waste disposal and storage.

### **3.12 Contaminated Ground incl. Spoil Heap Disposal Measures (Safe Removal of Materials)**

The site is essentially a brownfield site which contains a large spoil heap to the centre. In accordance with the Waste (England & Wales) Regulations 2011 and the Hazardous Waste Regulations 2005, (as amended), the heap will be removed from site to the previously agreed landfill, (acceptance of waste material has been previously agreed with the landfill site arranged by the Waste Carrier, S J Griffiths & Son Ltd). NRW have been contacted by the Waste Carrier and the declaration regarding the removal of waste has been submitted. Enzo's Homes Ltd shall liaise with Neath Port Talbot Council regarding reports required under the Remediation Scheme.

The waste shall be removed from site by the registered waste carriers, S J Griffiths & Son Ltd, and transported to the approved landfill site under Waste Transfer Notes. (see: Site Waste Management Plan (App 12) for further detailing).

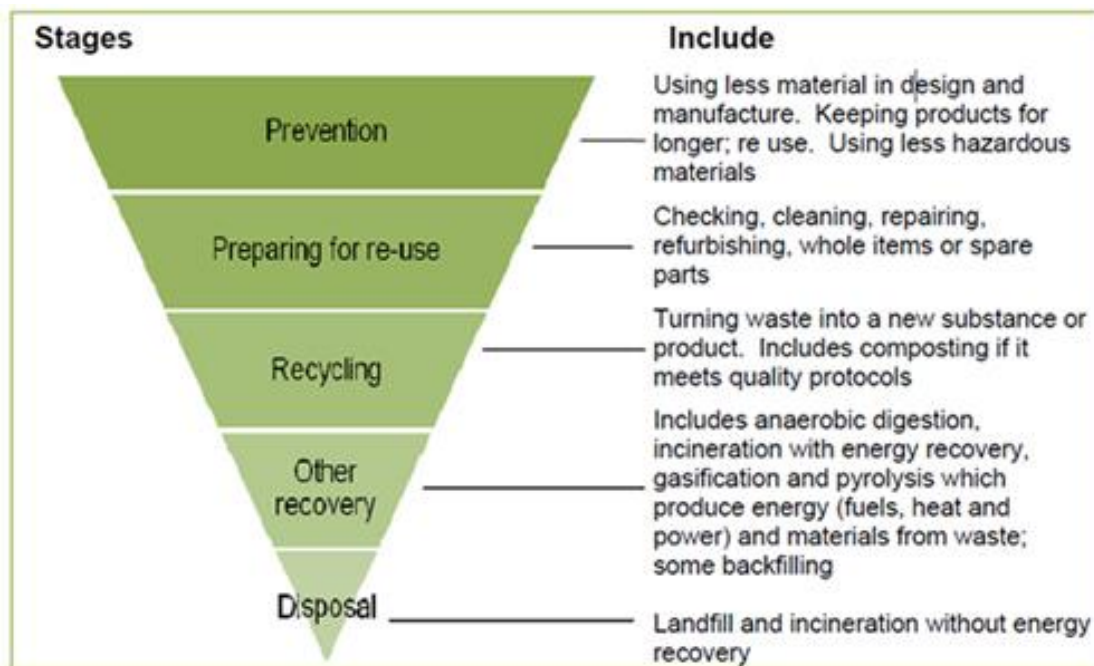
Groundworkers on site will wear protective clothing, hard hats, footwear and gloves. In addition, the following will be implemented:

- Hand washing and boot cleaning facilities will be available.
- Smoking will be designated to a location away from working areas.
- Good practices relating to personal hygiene will be promoted.
- Before site operations are commenced, the necessary COSHH Risk Assessments will be completed and disseminated to relevant persons.
- All visitors to the site will report to the site office and receive a visitors induction.
- All site personnel will undergo a site-specific health and safety induction prior to the commencement of works on-site. This will include the specific control measures to be implemented for the contaminated ground.
- The area worked shall be signed and barriered to prevent access by unauthorised persons.
- As per the Amphibian and Reptile Mitigation Strategy and Method Plan, the spoil heap shall be removed with an excavator under ecological supervision.
- The ecologist will inspect the area of work and catch any animals disturbed by the dismantling.
- Each bucket of rubble/waste will be inspected by the ecologist to ensure no animals are trapped within.

- Waste shall be loaded to the Waste Carriers Vehicle and sheeted before removal to the Landfill Site.
- The vehicle shall be subject to wheelwash/washdown in the dedicated area, before leaving site
- The driver shall furnish the site manager with a Waste Transfer Note for each load removed from site.
- The last load note shall be accompanied by an end of day note, itemising each load removed on that date.

### 3.13 Construction Waste

The Site Manager will be appointed as the environmental coordinator for the construction site and will work in conjunction with the company Health and Safety officer in ensuring the Environmental Policy and Site Waste Management Plan, (App. 12), is implemented in full. Enzo's Homes Ltd will aim to reduce the amount of waste generated and exported from the construction site during the construction works. This approach will aim to achieve compliance with the waste hierarchy.



Enzo's Homes Ltd's appointed sub-contractors will be required to investigate opportunities to minimise and reduce waste generation on site.

Where materials cannot be re-used (not practical), they will be forwarded to a designated waste disposal site using the approved carrier S J Griffiths & Son Ltd.

- Any waste needed to be removed from site will either be loaded directly into the tipper lorry and sheeted or removed from site in skips (covered, enclosed).
- Skips will be used to contain waste and covered when not in use to prevent dust and debris blowing around the site.
- As the construction phases progress and the buildings become enclosed, rubbish that is generated will be collected and placed into bags or containers to transfer into the designated skips on site.

### 4.1 Monitoring

On-site meetings/inspections will be carried out as necessary to confirm the appropriate use of mitigation measures identified within the Enzo's Homes Ltd environmental plan relating to pollution control. These meetings/inspections will highlight any further issues/measures which may be relevant either prior to commencement or during the works.

To ensure all mitigation measures put in place are maintained and continue to be effective, monitoring will be carried out on a regular basis and findings recorded. Reptile fencing/watercourse & tree protection fencing shall be included in the Temporary Works Folder for daily monitoring.

Regular checks of plant and equipment will be undertaken by Enzo's Homes Ltd to identify any oil or fuel leaks and will be carried out to confirm the condition of the plant. Regular checks for visual evidence of contamination/sediment will also be made alongside any water courses, nearby working areas and in areas of surface water discharge.

## **4.2 Training**

Enzo's Homes Ltd Site Managers undergo Environmental Awareness training (certification App. 13)

All employees, subcontractors, suppliers and visitors to the site will be notified via a site induction of the requirements on site for pollution prevention.

Through toolbox talks, site personnel and subcontractors will be educated on those aspects of CEMP as appropriate to the task assigned to them. The Ecological Clerk of Works shall deliver Toolbox Talks before any works to site strip.

## **5.1 Boundaries & Site Fencing - See App. 2 Initial site compound area;**

The compound area will change as the site progresses, the plan shows the initial set up needed to cater for the removal of the large rubble pile. Subsequent changes to the compound plan shall be made by the Site Manager and the CEMP updated as appropriate.

- **Site Boundary Fencing Line**
- **Emergency Vehicle Access**
- **Site Compound Area: to include office & welfare facilities as 5.2 below, designated smoking area, parking, plant & materials storage area**

The site plan at App. 2 shows the site access and heras fencing to the site boundary, (highlighted in red) between the surrounding areas and the construction site. This will be used as a barrier to prevent unauthorised access where this achieves the minimum height of 2m, has no gaps where persons can enter and is not able to be easily climbed. Under Temporary Works all fencing will be checked on a daily basis by our site staff to ensure it remains secure at all times. Out of hours security will be provided by alarmed security cameras, backed by a reactive security patrol. The site office, welfare, materials storage and car parking areas will be encompassed by double clipped Heras fencing to further maintain security.

## **5.2 Site Accommodation**

Enzo's Homes Ltd will provide 4 units which will be double-stacked, shown (App. 2). These will consist of a drying room and toilets with collection tank on the ground floor. The site office and welfare/canteen unit on the 1st floor. The welfare unit will provide all the necessary welfare facilities (such as canteen, drying room etc) Portable toilets facilities for the construction team will be provided by Mobile Mini and will be maintained by the supplier on a weekly basis.

## **5.3 Controlling Personnel Access onto Construction Site**

A security gate will be located at the Site entrance. This will control the movement of all construction traffic and personnel entering and leaving the site.

Visitors will be directed to the site office via signage at the main entrance, unauthorised visitors will not be permitted access.

## **5.4 Off-Site Activities & Traffic Management**

- Site Signage to be displayed at entrance
- Traffic Management Plans will be distributed to delivery contractors.

- Reference will be made to the Construction Traffic Management plan (CTMP)

In addition, Enzo's Homes Ltd will further minimise the likelihood of congestion on the adjacent highways by employing strict monitoring and control of all vehicles entering, exiting and travelling across the site. This will require:

- Enzo's Homes Ltd specifying delivery and collection times, avoiding peak times;
- Consolidation of deliveries wherever possible;
- Advanced notification by the delivery driver/supplier of the intended time of arrival to ensure that the site can be accessed immediately and that the Site Manager or Supervisor is present to accept the vehicle.
- The Site Manager will agree, in advance, a delivery schedule and then review and prioritise deliveries on a daily basis.

Construction traffic and delivery vehicles will use the site entrance from its junction with A4109 (App. 3). The A4109 is accessed from the A465. All drivers will be instructed to avoid roads where there is a weight restriction. A plan of routes will be available for delivery firms and visitors. Trained site staff will assist when delivery vehicles are accessing the site.

- It is considered that the impact associated with a temporary increase in construction traffic from the construction site can be mitigated by means of vehicles arriving and departing at staggered intervals during the day in order to reduce congestion and delays on the local road network. These conditions can be firmed up later after consultation with the relevant parties if necessary.

## **5.5 Contractor/Visitor Car Parking Proposals**

Contractor parking will be catered for within the compound area, no vehicles will be allowed to park on the highway, (App. 2).

## **6.1 Environmental Impacts**

Potential pollution impacts during the construction works are covered in 3.1 above.

A review has been undertaken of the potential sources of adverse impacts to the environment, the results of this are presented below.

### **Issue Potential Impacts:**

- Dust/air quality: Wind blowing dust from ground surfaces, stockpiles, vehicles, work place and cutting and grinding materials. Exhaust emissions from lorries and plant delivering and removing materials including dust and particulates.
- Ecology: Disturbance to nesting birds/reptiles. Water/ mud run-off into drains.
- Energy usage: Indirect impacts associated with energy consumption such as CO2 emissions, depletion of natural resources, air pollution etc.
- Fuel & construction materials storage: Accidental spills, discharges to drains/ storm-water systems, river and contamination to ground.
- Hazardous materials & contaminated land: Exposure of the workforce to hazardous materials and contaminated land, mobilisation of any source contaminants and creation of a pathway from source to groundwater receptor.
- Noise: Increased road noise levels from vehicles. Increased noise levels from the plant during the demolition and construction work on-site.
- Traffic: Traffic congestion caused by site traffic. Increased vehicle movements mainly consisting of construction vehicles. Disruption from abnormal or hazardous loads, exhaust emissions.
- Waste: Waste generation and its disposal.
- Road cleanliness: Mud on highway creating slippery/hazardous driving conditions. Contamination of storm sewers.

- Water and water usage: Increased sediment loadings to the storm-water system. Potentially contaminated storm-water run-off. Natural resources depletion.
- Vibration: Increased vibration levels from vehicles. Increased vibration levels from the plant during the demolition and construction stages.

## **7.1 Ecology**

Enzo's Homes Ltd is committed to minimising the environmental impacts of its operations, activities and services by carrying out works in a sustainable and environmentally responsible manner by understanding the key requirements and control measures associated with:

- Pollution prevention
- Working near watercourses
- Nuisance (noise, vibration, dust, debris, litter, vehicle movements)
- Waste minimisation and preservation of resources
- Wildlife and habitats
- Archaeology and cultural heritage

This is achieved through:

- Complying with the law and industry codes of practice
- Assessing of environmental aspects and impacts
- Promoting the use of sustainable products and materials
- Minimising the consumption of natural resources
- Minimising waste
- Preventing of pollution, emissions and nuisance
- Seeking to reduce carbon emissions
- Protecting and enhancing wildlife and its surroundings.
- Through best practice/regular toolbox talks, encouraging staff/contractors to act in a sustainable and environmentally responsible manner
- Continually seeking to improve environmental performance

## **Protecting The Environment**

Enzo's Homes Ltd will ensure;

- The covering of stored materials
- Exposed soil is re-vegetated as soon as feasibly possible
- Protection of any storm water drain inlets
- That a Specialist Contractor shall be employed for the removal of the invasive species identified. Measures will also be taken to ensure the prevention of spread of the plant to other areas of the site, report to be prepared by the specialist contractor.

A desktop/field survey of the site has been completed by qualified and experienced ecologists, I&G Ecological Consulting Ltd. All habitats within the proposed works area, including a data search of the site and surrounding area up to 1km, were noted, and the potential for protected or otherwise notable species was assessed.

A further Amphibian and Reptile Mitigation Strategy and Method Statement has been raised and recommendations will be followed.

## **Protection of Watercourse Before Culverting Operation**

The stream will be culverted as part of the development of the site, as the stream was considered to provide a potential habitat for a range of species, as such the following measures shall be implemented until such a time as works to culvert the watercourse have been completed.

The following requirements will be adhered to:

- Ecological Clerk of Works to deliver Toolbox Talk to all site operatives
- Use of protective fences and signage ensuring no vehicle/body encroaches the area
- Protective fences to be included in the Temporary Works Register and subject to daily checks
- Damage identified or missing signage to fencing shall be rectified immediately
- No refuelling shall take place within 30m of appropriate watercourses/bodies
- No generators or similar plant and machinery shall be used within 30m from watercourses/bodies
- Oils, fuels, chemicals must be stored in the compound area as defined in (App. 2)
- The construction site will, where possible, use double bunded plant or equipment. Where double bunded plant or equipment is not available, there will be an additional method of containment to ensure no pollution or spillages occur ie spill kits/drip trays
- Spill kits to be available at all times
- Any spoil heaps shall be covered and at least 30m away from appropriate watercourses/bodies where possible
- No works involving concrete transfer between vehicles or into vehicles shall take place within 30m of appropriate watercourses/bodies
- Regular checks for visual evidence of contamination/sediment will also be made alongside any water courses, nearby working areas and in areas of surface water discharge to ensure compliance with above
- Any incidents must be reported to NRW 0300 065 3000

## **Tree Protection**

Works around protected trees shall be with reference to the Tree Survey/Constraints Plan, which is currently being prepared by David Rice Forestry.

## **Vegetation/Scrub Clearance and Site Strip**

The Ecological Appraisal Report of March 2020 states that the 'site comprised what is essentially a brownfield site, there being a considerable amount of waste materials on site including piles of rock, rubble and a large mound of materials in the centre of the site, which has now grown over with grasses, rushes and scrub. Much of the site is vegetated' Recommendations include a precautionary approach to clearance of vegetation.

All clearance shall follow the Amphibian and Reptile Mitigation Strategy/Method Statement raised by Sian Musgrave, Amber Environmental Consultancy Ltd, August 2020;

Recommendations include:

- A sensitive and gradual clearance of vegetation on site, ideally such work would be done when reptiles are active (not in hibernation), and the most suitable period for such work be between September / October.
- Supervised by the Ecological Clerk of Works (ECW), who can remove any animal from danger to a safe location behind the reptile fencing.
- No vegetation/shrub to be trimmed back or removed before a tool box talk is given by the ECW, who will explain the behaviour/ecology of reptiles/dormouse/birds and how the works are to proceed.

- Shrubs and other bushy plants (e.g. brambles) can be cut back in sections using appropriate powered hand tools (e.g. brush cutters), to a height of 150mm from the floor. No cutting will be done below this level until the ground area concerned has been checked by the ECW.
- Any cut vegetation must be picked up by hand and placed in a skip for removal
- Areas of grass and shrub can also be trimmed back, using powered hand tools, to a height of 150mm.
- The ECW will be present when the top layers of any soil are removed and will inspect the bucket used on any excavator for presence of undetected reptiles. Ideally any soil would be removed from site so that it does not become a refuge for reptiles. If this cannot be done then a barrier must be placed around any such soil heaps to prevent reptiles accessing them and using them for hibernation.
- Reptile Fencing (App. 14), is already insitu to prevent any reptiles captured and relocated from re-entering the construction area.
- Any rubble piles, loose material, logs, discarded items etc, to be removed by hand. The ECW will agree with the site manager/contractors, which items need to be supervised by the ECW and how and where items will be removed to.
- The site should be retained as bare ground until the development commences to prevent re-colonisation from the adjacent areas. If there is a delay and the vegetation grows over 200mm high, then the same procedures should be followed to retain the habitat as unsuitable for amphibians and reptiles.
- All works must be undertaken in suitable weather, when amphibians and reptiles are likely to be active.
- Any animals found during clearance works should be recorded by the ECW, together with species, sex, location, date, time, weather conditions and temperature to enable a complete record to be kept.
- If no animals are found during clearance and stripping, then it is not necessary to monitor the success of the mitigation. If animals are found, then an occasional check of the receptor site can be undertaken in suitable weather when the animals are active.

## **Eradication of Japanese Knotweed & Himalayan Balsam**

It is reported that patches of Japanese Knotweed and Himalayan Balsam exist on the site. Enzo's Homes Ltd employ South Wales Knotweed Removal, a fully qualified Japanese Knotweed Certificated Surveyor, (JKCS), whose treatment methods are endorsed by the Environment Agency Codes of Practice and the industry trade body, The Property Care Association. A report has been ordered and the recommendations therein shall be adhered to.

## **Wildlife**

### **Reptiles & Amphibians**

The Ecological Appraisal Report carried out by I&G Consulting Ltd, March 2020, found that:



- ***The vegetation cover over the is of mixed height and density and structure, and the range of habitats (scrub, bare ground, stone piles etc) give the site the structural complexity that reptiles require to provide suitable ecotone areas for basking and cover.***
- ***The slower sections of stream and waterlogged areas, as described above, provide suitable habitat for Amphibians. There are also habitats, as above, to provide refuge/hibernation opportunities for terrestrial phase amphibians. The dense areas of rush/grassland and scrub will support terrestrial phase amphibians.***

The conclusion being that a method statement and mitigation plan should be prepared in order to protect amphibians during site clearance and construction and, acknowledgement in the case of reptiles, that a designated area for reptiles has been constructed, sealed off from the main site by TAF fencing, (App. 14) and reptile clearance works have been instigated following the recommendations of the previous PEA. The Amphibian and Reptile Mitigation Strategy/Working Method Statement has been prepared by Sian Musgrave, Amber Environmental Consultancy, August 2020 and reptile fencing is already in-situ; Reptile Fencing (App. 14)

- The reptile fencing shall be included within the Site Managers Temporary Works daily checks, and records retained in the site office
- The reptile fencing shall be kept in place at all times during the site strip.
- If, at any time, the fencing suffers damage, it shall undergo immediate repair to reinstate to original condition and repairs noted in the Temporary Works folder.

#### **Rubble Pile to Centre of Site**

The site has been checked for suitable habitats for reptiles, as identified in the ecological surveys. The site has a number of minor rubble piles and one large one, made up of concrete and rubble to the centre of the site – this rubble pile was noted following a reptile survey/clearance, undertaken in October 2019 by Siân Musgrave BSc (Hons) MCIEEM, the Ecological Appraisal Report carried out by I&G Ecological Consulting Ltd in March 2020 and the Amphibian and Reptile Mitigation Strategy/Working Method Statement, prepared by Sian Musgrave, Amber Environmental Consultancy, August 2020;

- *The large pile of dumped waste in the centre of the site will be levelled during site works.*
- *It is recommended that this is done with machinery under ecological supervision, as this is a large pile of unidentified waste, which for health and safety reasons, cannot be dismantled by hand.*
- *The ecologist will inspect the area of work and catch any animals disturbed by the dismantling.*
- *Each bucket of rubble/waste will be inspected by the ecologist to ensure no animals are trapped within.*
- *Any relocated piles of rubble/soil on the site must be reptile fenced to ensure animals do not use them as new refuges.*

The rubble/waste disposal measures in accordance with The Waste (England & Wales) Regulations 2011 and the Hazardous Waste Regulations 2005, (as amended), are further discussed in 3.12 Contaminated Ground Spoil Heap Disposal Measures, above and detailed in the Site Waste Management Plan, (App.12).

#### **Birds**

The report carried out by I&G Consulting Ltd found that: *“During the field survey, no bird species, which are listed under the LBAP and UK BAP as being associated with the on-site habitats, were recorded. The survey concluded that the site consisted of suitable habitat which could support priority species such as Thrush species, House Sparrow and Bullfinch.”*

A number of bird species were observed during the survey; Mistle Thrush, Grey Wagtail, Chaffinch and House Sparrow. The mix of vegetation types will provide forage and shelter/nesting opportunities for a range of species.

The conclusion being that "Vegetation clearance shall take place in the months September – February, outside of bird nesting season, however there is also consideration to be made for reptiles and ideally therefore the clearance would be carried out in September to October." Added to that recommendation, Enzo's Homes Ltd shall ensure that;

- All active nests will be left undisturbed
- Buffer zones around nests to be created
- If nesting birds are found on site, all works in that area will have to cease and advice sought from the environmental officer

## **Bats**

The report carried out by I&G Consulting Ltd found that:

***There are a number of mature trees along the boundaries of the site, particularly the northern roadside boundary where there are large specimens of Oak, Birch and Alder. These boundary trees are likely to provide flight lines and foraging opportunities for generalist species such as pipistrelle.***

The conclusion being the boundary scrub and tree-lines will act as flight lines for bats and any dark corridors should be maintained as such. An appropriate lighting plan in relation to bats will take such habitat into consideration.

Any mature trees which require felling or management in order to accommodate the development will be subject to inspection and assessment for suitability for use by bats, by a licenced bat surveyor following current guidelines (Bat Conservation Trust).

Bats could be present all year round, especially if making casual use of the site. If bats are encountered, or any evidence found during the course of works;

- NRW will be consulted and advice sought. 0300 065 3000
- Suitable protection zones around any bat roost using blue rope ~ 30m buffer zone
- Any works likely to encroach within 30m of the bat roost are to cease and advice sought from the Environmental Representatives, NRW

## **Otters & Water Voles**

The Ecological Appraisal Report, March 2020, carried out by I&G Consulting Ltd mentions that there had been no otter activity noted on site and that the data search returned 3 records within the 1km parameter – closest being 322m away from the site centre, but that the small stream was considered to have potential to support both water voles and otters. 'The stream is shallow sided for the most part, however there is a mix of vegetation types and density along its banks. Therefore, the habitat present was considered suitable to support water voles'

- A pre works walkover survey shall be carried out by the Ecological Clerk of Works
- Mitigation measures are as included in the Amphibian and Reptile Mitigation Strategy/Working Method Statement

## **Hazel Dormouse**

The report carried out by I&G Consulting Ltd noted that the bramble scrub provided suitable habitat for Dormice, however, there were no records for Dormouse in the county and that a precautionary approach to site clearance should be taken (as noted in 'Vegetation/Shrub Clearance and Site Strip' above)

## **Badgers**

The report carried out by I&G Consulting Ltd noted that the grassland was considered sub-optimal for Badger foraging as soils were mostly poor/thin with considerable amounts of debris beneath, making it less likely as a good source of Earthworms and other subterranean prey items. The dense areas of scrub may provide cover but proximity to road and

disturbance from neighbouring properties suggests it is sub-optimal habitat for setts. No evidence of badger activity was found within the scrub or elsewhere on the site.

### **Site Lighting**

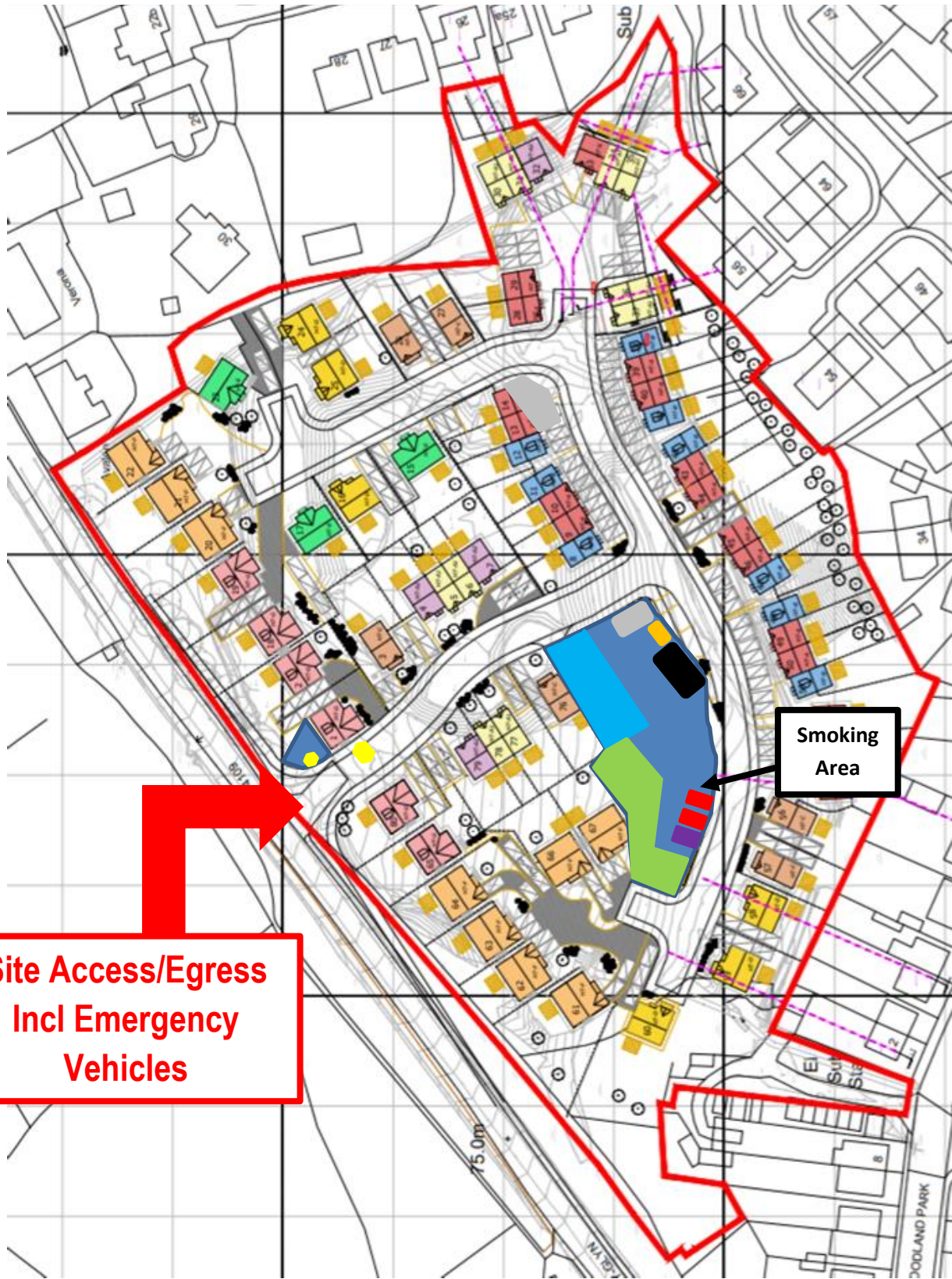
- Lights will be positioned to avoid lighting areas outside the work area and therefore away from wildlife corridors and ecologically sensitive areas/trees etc
- Lights will be switched off when not required for safety or security.
- Lights to be directed downward to the work area.
- If considered necessary, screens or baffles will be erected to reduce light spilling outside of the work area.

Enzo's Homes Ltd has a suite of Ecological Toolbox Talks prepared, (App. 11), that will be briefed to all operatives working on the development.

[illegible]



App. 2 Initial Site Compound Area (subject to change as site progresses)



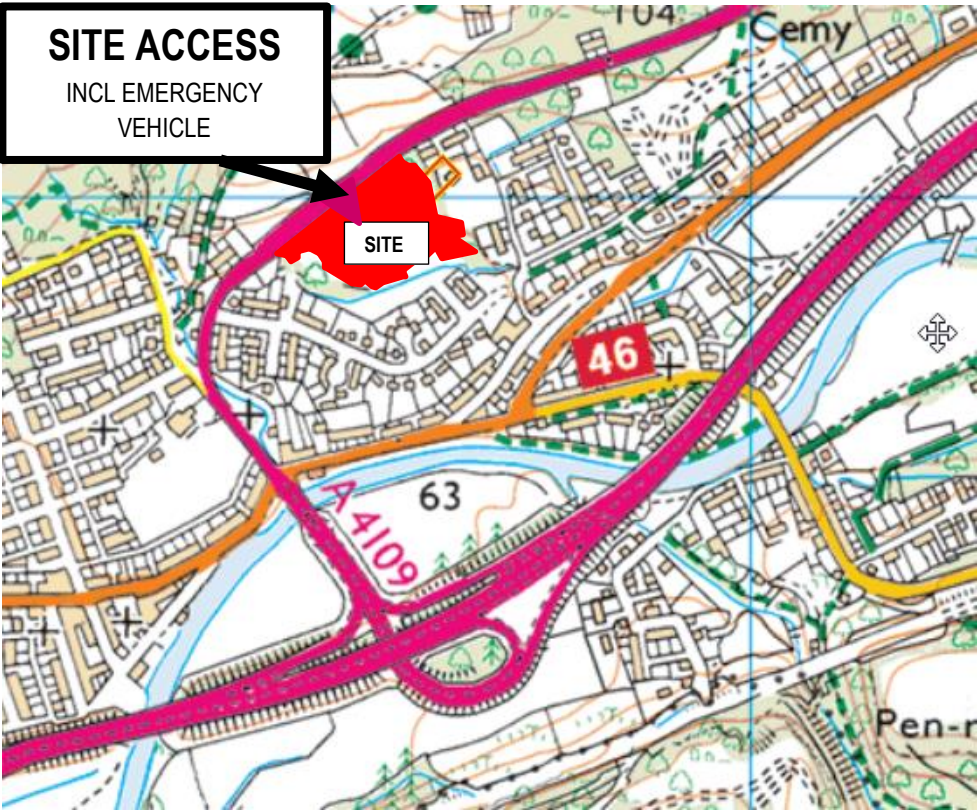
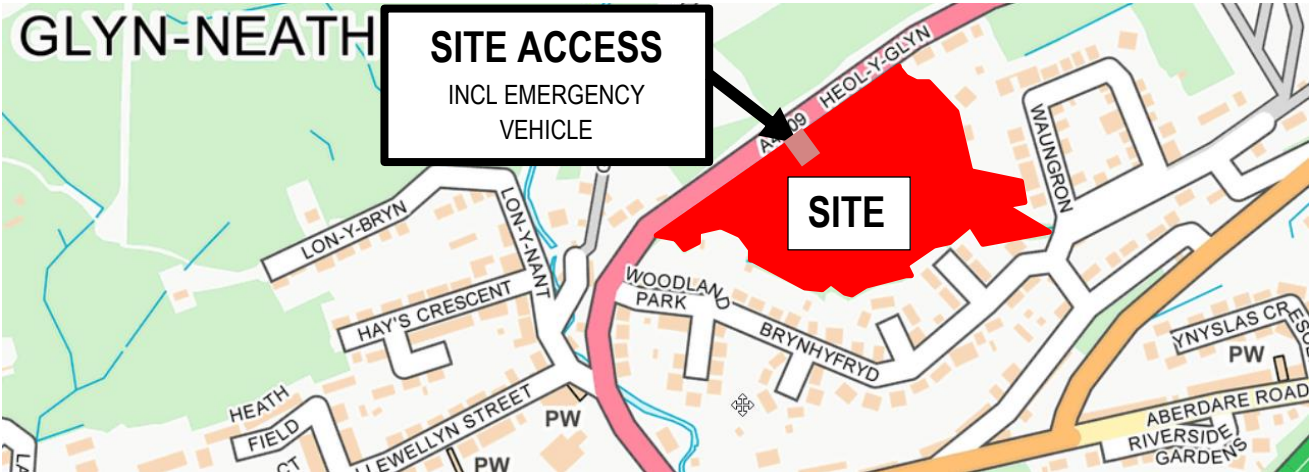
Site Access/Egress  
Incl Emergency  
Vehicles

Smoking  
Area

- |   |   |  |  |
|---|---|--|--|
|  Double stacked Welfare Units |  COSHH/Fuel Storage Area |  Silo           |  Skip Area    |
|  Contractor Parking           |  Material Storage Area   |  Lockable Storage |  Plant Lay Up |



App. 3 Highways Map: Delivery Transport Routes



Construction traffic routes to/from site

## App. 4 Spill Procedure

### Environmental Incident Response Procedure for Construction Sites

Spillage or discharge of a potential pollutant, such as oil, silt, cement or water used to extinguish a fire.

Can it, using on site equipment, be prevented from entering a drain or watercourse or, if airborne, from leaving the site or premises?

**Yes = Minor Incident**

**No= Major Incident**

#### **Minor Incident**

PREVENT without putting yourself at risk any further spillage or discharge

ELIMINATE any source of ignition

CONTAIN spillage or discharge and prevent it from entering a drain or watercourse

CHECK spillage or discharge has not reached any nearby pond, river, stream etc.

NOTIFY the Site Manager immediately, giving the following information:

- Location of incident;
- Cause;
- Extent of pollution;
- Substance involved and quantity.

The Site Manager will then notify the company Health and Safety officer and the Director responsible for Environmental compliance.

#### **Major Incident**

NOTIFY the Site Manager immediately giving the following information:

- Location of incident;
- Cause;
- Extent of pollution;
- Substance involved and quantity.

#### **IMPLEMENT**

The Site Manager will then implement the emergency response plan

In the event of an incident, NRW should be informed e.g. silt entering a watercourse, large chemical spill, hazardous chemical spill. The phone number for NRW is (0800 80 70 60) incident hotline.

## App. 5

# Spill Kit Toolbox Talk

### Introduction

The following toolbox talk is meant as a helpful guide in the use of spillage control equipment. The spill products in this kit are designed to be used to contain and absorb spilt liquid. Environment Agency Guidelines and current legislation make it an offence for any polluting matter to enter controlled waters (rivers, streams, lakes etc).

Before attempting to tackle any spillages of dangerous liquids, get help and always wear the appropriate personal protective equipment.

Spillages can be easily tackled by following these simple steps:

Isolation – Contain – Absorption – Clean up & Disposal – Report and Reorder

### Isolation

Wherever possible try to isolate the area of a spillage with a caution tape or suitable warning device to prevent other people becoming part of the incident. Extinguish all cigarettes and naked flames and try to keep upwind of the spillage.

### Contain

Spill safety procedure provides you with several means of containing liquids, depending on the type of kit you have purchased you should have one or several of the following items.

Leak block granules are a loose bentonite granule that can be used to contain liquids by damming or by adding water and kneading to form a putty, they can be used to seal or plug holes in tanks or drums. Note: Leak Block Granules need to be sprinkled with water first if being used as a dike on hydrocarbon spillages.

Absorbant socks are filled with absorbent material and can be used to surround a liquid spillage in isolation or in conjunction with the leak block granules.

### Absorption

Your kit will contain an appropriate sorbent material in either loose granular form or an appropriate absorbent fabric.

Pads/wipers can be used directly on the spilled liquid to absorb it. White, oil only materials will float on water but will absorb most hydrocarbons. Chemical sorbents (grey or yellow) will absorb water, oil and most chemicals.

Sock/booms, as well as being used to contain liquid spillages, also have absorbent properties.

### Clean up & Disposal

If not already supplied with your kit, you will need to provide adequate means of disposal of any saturated absorbent materials. Remember all saturated absorbents take on the properties of the liquid that they have absorbed and may then be classed as hazardous waste. Contact the appropriate local authority for disposal advice. Never throw hazardous waste onto a general waste skip.

### Warning

All components of Spill Kits are safe to handle and do not pose a direct health risk. However, normal precautions should be taken when handling Oxe Oil Emulsifier, Drain Covers and Leak Block Granules as these may cause dermatitis or skin irritations on sensitive individuals. Similar precautions should also be taken when handling even the Melt Blown Absorbent materials, although no adverse effects have been reported with the materials.

When using Spill kits to contain and absorb a spillage, every effort should be taken to avoid contact with the spilt liquid.

Where the nature of the hazard is known, reference should be made to the liquid manufacturer's or supplier's data sheet and precautions contained therein should be adhered to whilst using the contents of the Spill Kit to absorb and dispose of the relevant material.

In particular, when dealing with Chemical spillage the Spill Kit should only be used where the liquid offers no direct threat to life or health in the handling of the material. Again, reference should be made to the manufacturer's data sheet.

If doubt exists as to the nature of the spilt substance then reference should be made to Specialist Organisations used to handling such spillage, i.e. Fire Brigade, Chemical Control Experts or the Water Board.

Personal Protective Equipment should be worn whilst dealing with hazardous spill; in all cases a proper risk assessment should be carried out by a qualified person. The Personal Protective Equipment supplied in the kit offers basic protection.

The user should assess the risk to ascertain whether alternative or additional Personal Protective Equipment is required. Please note that respiratory equipment included in kits has a limited shelf life.



## **Appendix 6 – Emergency Preparedness and Response Procedure**

### **Purpose**

This procedure describes the processes to identify potential emergency situations and potential accidents that can have an impact on the environment, and how Enzo's Homes Ltd responds to such events.

### **Scope**

This procedure contains the following sections:

- Identification of potential emergency situations and accidents;
- Response to emergencies and mitigation of adverse environmental impacts;
- Test and review of emergency procedures.

The procedures for preventing and mitigating the following emergency situations are described:

### **Offices:**

- Fires

### **Construction Sites:**

- Fires, explosions
- Rainstorms, typhoon or other unexpected weather extremes
- Major chemical spillage
- Interference to utility services due to accidents – eg accidental damage to power cables, gas supply and water supply pipelines
- Discovery of 'site of historical or archaeological heritage', graves, dangerous objects or substances (such as bombs, arsenals, explosives and unknown chemicals)
- Discovery of rare or protected species

### **Implementation**

The Company Director and Site Manager are responsible for implementation of this procedure.

The Company Director and Site Manager are responsible for identifying potential emergency situations and potential accidents and determining those potential situations/accidents that may have a significant environmental impact. The Company Director and the Site Manager are responsible for the review and periodic testing of elements of the emergency procedures.

The Company Director and Site Manager are responsible for the implementation of corrective and preventative action resulting from an emergency situation/accident.

### **Identification of Potential Emergency Situations And Accidents**

Identification of potential emergency situations and accidents will be carried out through the risk assessment process for all new contracts/introduction of new working methods. Identification of methods, risks, hazards and controls, (based on site/job specific risk assessments), may also be documented in new contract proposals as requested by the client. These will include method statement, legislation and PPE requirements. Proposal documents will also include identification of environmental issues covering potential noise, land, water and air pollution.

The purpose of risk assessment is to identify the significant risks in the workplace and then control those risks at an acceptable level and to comply with the Management of Health & Safety at Work Regulations 1999.

All aspects of the work activity are reviewed for Risk Assessment. Where hazardous chemical risks are encountered, C.O.S.H.H. Assessment Procedures are followed and where other risks are to be

assessed, the procedures in the Enzo's Homes Ltd Health and Safety management system will be implemented. This includes key aspects such as working from height, confined spaces, manual handling, contact with waste, use of equipment and environmental risks.

Where appropriate, detailed method statements are also produced for particular contracts/site operations. These method statements include scope of work, job specific instructions, risk assessment, accident and near miss reporting, tool box talks, PPE and equipment information and sign-off / acknowledgement sheets.

Emergency Response activities include spillage / contamination control measures. If an emergency situation or accident occurs in relation to the collection, processing and shipment of waste/recycled by Enzo's Home Ltd, emergency response activities will be implemented accordingly.

The identification of potential emergency situations and accidents that could have an adverse environmental impact is supported by the Environmental Aspect and Impact Registration activity which has identified any significant impacts using form EMS01, this includes those that may occur under emergency conditions.

The potential for emergency situations or accidents at near-by facilities must also be assessed and recorded where appropriate.

**Response to Emergencies and Mitigation of Adverse Environmental Impacts** The identification of methods, risks, hazards and controls (based on site/job specific risk assessments) in relation to the above are documented in Enzo's Homes Ltd Health and Safety management system which will include method statements, risk assessments, legislation and PPE required. In the unlikely event of an emergency situation arising that has an adverse environmental impact, emergency response actions, as documented in risk assessments and material safety data sheets, will be implemented.

Upon satisfactory completion of the emergency response, appropriate paperwork documentation as required by the Local Authority/Environment Agency/NRW is to be raised and submitted. In parallel with this a post-accident evaluation will be carried out and appropriate corrective and preventative action implemented.

Corrective and preventive action must be documented on the Environmental Report form (EMS02) and should include details of the emergency situation / accident, root cause, environmental impact, corrective and preventive actions, responsibilities and timescales.

In the event of an emergency situation, the appropriate elements of Enzo's Homes Ltd Health & Safety documentation will be followed, overseen by the appointed H&S representative, Health & Safety Office and Site Manager. This will include;

- Evacuation of building / affected areas;
- Liaison with emergency services;
- Instigation of communication plan;
- Review of environmental implications;
- Implementation of mitigation and response actions.

Post-accident evaluation will also be carried out and appropriate corrective and preventive action documented on the Environmental Report form (EMS02) as above.

### **Test and Review of Emergency Preparedness and Response Procedures**

The test and review of the Emergency Preparedness and Response process is carried out in accordance with Enzo's Homes Ltd Emergency Response procedures. This may include the test / review of elements of disaster recovery, training / performance of emergency response personnel, building evacuation, internal and external communication, availability of risk / hazard information and effectiveness of (planned) mitigation and response actions. The majority of these processes are tested and verified each time an emergency situation arises.

In addition to the above, response to simulated emergency situations is also tested through periodic (at least annual) exercises overseen by the Company Director/Site Manager, in accordance with Enzo's Homes Ltd Health and Safety management system procedures (where applicable). Results of these exercises are recorded and any improvement opportunities identified.

The evacuation of all Enzo's Homes Ltd sites is also tested periodically. All office computers are appropriately backed-up. A test of the office back-up process is carried out by the Office Manager on a quarterly basis.

### **Related documents**

- App. 7 Emergency Preparedness Plan
- App. 8 Environmental Aspects and Impacts Registration Form (EMS01)
- App. 9 Environmental Report Form (EMS02)

## **App. 7 – Emergency Preparedness Plan**

### **Plan Contents:**

#### **Purpose**

To ensure that relevant staff are aware of their responsibilities and the process to be followed in the event of a possible, probable or actual incident involving pollution into the adjacent watercourse.

#### **Scope**

From: The planning of what is required and what actions are to be taken, should an incident arise, to reduce the impacts of the incident.

To: How to undertake the required actions during an actual incident.

#### **Incident Management Procedure**

Local incident control is the structure in which the field based response to an incident operates (i.e. the Site Management team). It refers to essential activities and how they are organised.

Formal incident control is an essential element of managing MINOR and MAJOR incidents on the construction site as set out in the emergency procedure below:

Spillage or discharge of a potential pollutant, such as oil, silt, cement or water used to extinguish a fire.

Can it, using on site equipment, be prevented from entering a drain or watercourse or, if airborne, from leaving the site or premises?

YES = Minor Incident

NO = Major Incident

#### **Minor Incident:**

PREVENT without putting yourself at risk any further spillage or discharge

ELIMINATE any source of ignition

CONTAIN the spillage or discharge and prevent it from entering a drain or watercourse

CHECK the spillage or discharge has not reached any nearby pond, river, stream etc.

NOTIFY the Site Manager immediately, giving the following information:

- Location of incident;
- Cause;
- Extent of pollution;
- Substance involved and quantity.

The Site Manager will then notify the company Health and Safety advisor and the person responsible for Environmental compliance.

#### **Major Incident:**

NOTIFY the Site Manager immediately, giving the following information:

- Location of incident;
- Cause;
- Extent of pollution;
- Substance involved and quantity.

## **Implement:**

The Site Manager will then implement the emergency response plan. In the event of an incident, NRW should be informed e.g. silt entering a watercourse, large chemical spill, hazardous chemical spill.  
The phone number for NRW is **0300 065 3000** (incident hotline).

The Site Manager is the leader of all staff in the field. To ensure properly coordinated response, all other personnel must ensure that the Site Manager is aware of and approves of their activities.

The Site Manager will designate the location of where the incident control is to be established. This could be one of the following:

- at the site welfare facility; or
- a fixed safe marshalling point at the site of the incident; or
- a third-party office.

All staff must be aware that if they arrive on site and commence activities they are responsible for ensuring the handover/ continuity of those activities when they leave site.

The Site Manager will appoint personnel to cover particular site roles. Individuals may be asked to cover more than one role. Additional persons may be needed to be drafted into the area to undertake roles. If a role cannot be filled locally the Site Manager will resource it from a third party.

## **Evacuation Routes & Emergency Contact Numbers**

### **Evacuation Routes**

Evacuation route maps are posted in the welfare facility. The following information is marked on evacuation maps:

- Emergency exits / primary and secondary evacuation routes
- Locations of fire extinguishers
- Fire alarm location
- Assembly points

## **Medical & Fire Emergency**

### **Medical Emergency**

Call emergency phone number: 999

Provide the following information:

- a) Nature of emergency;
- b) Location of the emergency (eg: address, building, room number etc);
- c) Your name and phone number from which you are calling.

Do not move victim unless absolutely necessary.

- Call the following personnel trained in First Aid to provide the required assistance prior to the arrival of the professional medical help.

Name:

Telephone No:

TBC

TBC

If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance:

- Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).
- Clear the air passages using the Heimlich Maneuver in case of choking.
- In case of rendering assistance to personnel exposed to hazardous materials, consult the Material Safety Data Sheet (MSDS) and wear the appropriate personal protective equipment. Attempt first aid ONLY if trained and qualified.

### **Fire Emergency/Construction Sites**

When a fire is discovered:

- Activate the nearest fire alarm (if installed)
- Notify the local Fire Department by calling 999
- If the fire alarm is not available, notify the site personnel about the fire emergency by the following means:
  - Voice communication
  - Phone
  - Radio

### **Fight the fire only if:**

- The Fire Department has been notified;
- The fire is small and is not spreading to other areas;
- Escaping the area is possible by backing up to the nearest exit;
- The fire extinguisher is in working condition and personnel are trained to use it.

### **Upon being notified about the fire emergency, all persons on site must:**

- Leave the work area using the designated escape routes.
- Assemble in the designated area;
- Remain outside until the site Manager announces that it is safe to re-enter

### **Site Manager must:**

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety;
- Coordinate an orderly evacuation of personnel;
- Perform an accurate head count of personnel reported to the designated area;
- Determine a rescue method to locate missing personnel;
- Provide the Fire Department personnel with the necessary information about the facility.

### **Site Manager must:**

- Ensure that all employees have evacuated the area;
- Report any problems to the Company Health and Safety officer and any enforcing authority.
- Assistants to Physically Challenged should assist all physically challenged employees in emergency evacuation.

### **Extended Power Loss**

In the event of extended power loss to the work or welfare facilities, certain precautionary measures should be taken depending on the geographical location and environment of the facility:

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge, causing damage to electronics and affecting sensitive equipment;

- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long term power loss.
  1. Standpipes;
  2. Potable water lines;
  3. Toilets.
- Equipment that contains fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.

#### **Upon Restoration of heat and power:**

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry;
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the work area and the welfare facilities.

#### **Hazardous Substance Spill**

The following are the locations of:

- Spill – Containment kits located in site storage facility
- PPE – Personal Protective Equipment is located in the storage facility & Site Managers office

Refer to COSHH assessment and Material Safety Data Sheet contained in the site file for the specific controls on dealing with spills.

When a large chemical spill has occurred:

- Immediately notify the Site Manager and Company Health and Safety officer;
- Contain the spill with available equipment (e.g., pads, booms, absorbent powder, soil, sand etc)
- Secure the area and alert other site personnel;
- Do not attempt to clean the spill unless trained to do so;
- Attend to injured personnel and call the medical emergency number, if required;
- Call a local spill clean-up company or the Fire Department (if arrangement has been made) to perform a large chemical spill clean-up;
- Evacuate the work area as necessary.

When a Small Chemical Spill has occurred:

- Immediately notify the Site Manager and Company Health and Safety officer;
- If toxic fumes are present, secure the area (with caution tapes or cones)
- Deal with the spill in accordance with the instructions described in the COSHH
- Small spills must be handled in a safe manner, while wearing the appropriate PPE.
- Review the general spill clean-up procedures.

## **Severe Weather**

Flood:

If indoors:

- Be ready to evacuate as directed by the Site Manager
- Follow the recommended primary or secondary evacuation routes

If outdoors:

- Climb to high ground and stay there
- Avoid walking or driving through flood water
- If your vehicle stalls abandon it immediately and climb to higher ground





## Environmental Aspects and Impacts Form

EMS01

### Impact / Aspects Reference No

1. Description of impact:

Occurring under normal/abnormal/emergency conditions?

2. Legal or other requirement applicable?

Applicability / significance of legal and other requirements (add to total score):

High – Score 3, Medium – Score 2, Low – Score 1

3. Operational control procedures (direct and indirect):

SCORING: HIGH SCORE = HIGH SIGNIFICANCE (Scores Of 11 Or Above)

Potential Harm (A)

Rating 1 – 5

Actual Harm (B)

Rating 1 – 5

Scale of Aspect (C)

Rating 1 – 5

Frequency of Occurrence (D)

Rating 1 – 5

TOTAL SCORE .....

Date: .....

(inc. Legislation score)



## Environmental Report Form

EMS02

**Type (tick relevant box)**

Customer	<input type="checkbox"/>	Complaint	<input type="checkbox"/>	Report No:	
Supplier	<input type="checkbox"/>	Corrective Action	<input type="checkbox"/>	Raised by:	
Internal	<input type="checkbox"/>	Suggestion/Feedback	<input type="checkbox"/>	Date:	

**Details of Issue (include any references as appropriate)**
**Root Cause/Potential Benefit/Environmental Impact**
**Action to be Taken**
**Review of Outcome/Action Effectiveness**
**Signatures:**
**Originator:**

.....

**Date**
**Management Representative:**

.....

**Date**



# CERTIFICATE OF ACHIEVEMENT

High Speed Training certifies that

**Carl Anderson**

has completed

## Environmental Awareness

A high quality, interactive training course that explains how environmentally damaging workplace processes can be managed by employees.

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A handwritten signature in black ink, appearing to read "D. Jordan".

Dan Jordan on behalf of High Speed Training

# Built Heritage

Talk 1

## What?

- built heritage is an irreplaceable and valuable part of our national "identity"
- buildings and structures of special architectural or historic interest may be listed or be subject to a Building Preservation Notice (BPN)
- areas containing built heritage may have been designated as a Conservation Area (CA)
- the local planning authority (LPA), is responsible for the protection of built heritage and its permission and/or consent is required before any work is carried out on a listed building or structure or any external works are carried out on a building within a CA.

## Why?

- **avoid environmental harm:** valuable heritage buildings or structures might easily be damaged either directly by construction works or through vibration or subsidence caused by nearby works
- **avoid prosecution:** it is an offence to demolish or carry out work on a listed building or structure or one subject to a BPN or to alter the external appearance of a building or structure within a CA without the permission or consent of the LPA.

## Questions

- 1 Are there any listed buildings on site?
- 2 What should be done if construction activities include works on or near a heritage building/structure?



### Do

- ✓ inform every person on site of the listed buildings that may be affected during construction.

### Don't

- ✗ alter, damage or demolish any listed building.

# Working On Or Near Watercourses

Talk 2

## What?

- surface waters include rivers, streams/burns, dry ditches, lakes/lochs, loughs, reservoirs, ponds, canals, estuaries and coastal waters
- construction and maintenance activities in or near water have the potential to cause serious pollution to watercourses. This could also lead to additional expenses associated with the costs of the clean up
- some activities with the potential for affecting watercourses may require an authorisation (eg maintenance of a bridge crossing a main river)
- potential pollutants from types of works could include:
  - **silt:** can kill aquatic life by smothering and suffocating. It can also cause flooding by blocking culverts and channels
  - **cement and concrete:** are very alkaline and corrosive and can cause serious pollution
  - **chemicals and solvents:** can be toxic to plants and animals if released in to the environment
  - **bridge cleaning debris:** dust, debris and wastewater are the most common pollutants produced by structure maintenance. Abrasive blasting produces the greatest level of dust and debris
  - **herbicides:** can seriously damage water ecology
  - **waste materials:** including hazardous/special waste
- special consideration needs to be taken when working on pontoons and barges to ensure risk of water pollution is eliminated



## Why?

- **avoid environmental harm:** construction and maintenance activities in or near water could seriously affect the bed and banks of a watercourse and the quality and quantity of the water
- **avoid prosecution:** it is illegal to pollute watercourses and prosecution could lead to severe fines.

## Questions

- 1 What activities might cause water pollution?
- 2 Are there any pollution prevention measures in place?
- 3 What should be done to avoid water pollution?
- 4 Where should polluting materials/waste be stored?
- 5 What should be done if incidents happen?

## Do

- ✓ if possible, prevent water becoming contaminated in the first place – it reduces the risk of pollution and the overall cost of control measures
- ✓ use methods of work that reduce or eliminate working in the watercourse and that do not contaminate surface water
- ✓ use materials (eg sealants, coating, oils, cement mixing) carefully to protect the environment
- ✓ store materials and waste in areas sited 10 m away from any watercourse and put containment systems and mitigation measures in place. Spill kits should be kept close to storage areas

- ✓ prevent dust or litter blowing into and run-off entering watercourses or surface water drain
- ✓ remove damaged leaking or empty drums from site immediately and dispose any drums via a registered waste disposal contractor
- ✓ ensure works are secured from vandals
- ✓ repeat incidents to site management **immediately**.

## Don't

- ✗ wash anything down in a watercourse.

# Adders And Snakebites

Talk 3

## Did you know?

- Adders are the only venomous snake native to Great Britain. They are extremely widespread and can be found on some of our construction sites
- They are unlikely to bite unless they are alarmed or disturbed; bites can be painful but are rarely fatal
- Adders are protected by law from being killed or injured



## What is the danger?

Only 10 cases of human death from an adder bite have been recorded in the last 100 years. However, although an adder's venom poses little danger to a healthy adult human, the bite is very painful and requires urgent medical attention.

Bites appear to happen when adders are surprised and they don't have time to retreat.

## How do I recognise an adder?

- A stocky snake, the adder is easily identified by the dark zigzag line passing along the back bordered by rows of spots
- The adder is typically active during the day when it hunts, mainly for small mammals
- The adder hibernates in winter, typically from September/October to March

## What are the symptoms of a bite?

- Pain, redness and swelling in the area of the bite
- Nausea and vomiting
- Dizziness and fainting

**Seek urgent medical attention**

## Do

- ✓ If you see an adder, stop work and report it to a supervisor
- ✓ The adder should be left to move of its own accord
- ✓ Any harm or injury that does occur to an adders must be reported
- ✓ In the event of being bitten by an adder, seek immediate professional medical help

## Do not

- ✗ Injure or harm the snake in any way – this is illegal
- ✗ Handle adders – if this is necessary leave it to trained professionals



# Badgers

Talk 4

## Did you know?

It is illegal to carry out any construction work close to a badger sett (burrow) without taking steps to positively avoid damage and without an appropriate licence from Natural England.

## How can you identify a badger sett?



- A badger sett entrance is usually D-shaped and at around 300 millimetres wide by 200 millimetres high
- There may be signs of freshly excavated material at the entrance or piles of leaves, dry grass, straw or bracken, which the badgers take inside to use as bedding.

## Why does this matter?

Badgers are protected and so are the setts they live in. Under the Protection of Badgers Act 1992, in England and Wales it is an offence to:

- Willfully kill, injure or take a badger or attempt to do so
- Cruelly ill-treat a badger
- Dig for a badger
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it
- Cause a dog to enter a badger sett
- Disturb a badger when it is occupying a sett

***This can lead to fines of up to £5000 per badger or up to six months in prison***

## Do

- ✓ Immediately stop work and report any badger sett found on site or close to the site boundary
- ✓ Seek guidance from a competent person before any work within 30 metres of a badger sett

## Don't

- ✓ Carry out any works that are likely to disturb, damage or destroy a badger sett
- ✓ Use heavy machinery within 30 metres
- ✓ Use light machinery within 20 metres
- ✓ Work within 10 metres of a badger sett without checking whether a licence is necessary

# Bats

Talk 5

## Did you know?

- ***In the UK all species of bat are protected by law***
- They tend to return to the same roosts each year, and these sites are also protected whether bats are present or not



## Where can they be found?

- They can be found in holes/cracks in trees, roofs, walls of houses and buildings, under bridges, in underground caves and old railway tunnels. Bats can crawl into holes only 15 millimetres wide
- Look out for bat droppings – dark brown/black, about four to eight millimetres in length – crumble easily
- A strong odour and large numbers of moth wings discarded by feeding bats may also be present near a bat roost
- They are commonly found under railway bridges, in viaducts and signal box roofs

## Why does this matter?

It is a criminal offence for anyone without a licence to:

- Kill, injure or handle a bat
- Be in possess of a bat (whether alive or dead)
- Disturb a roosting bat
- Damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not

***This can lead to fines of up to £5000 per bat and/or up to six months in prison***

## Do

- ✓ If a bat or a roost is found stop all works in the area immediately and report it

## Don't

- × Touch or handle a bat as they are very delicate and this can cause them serious harm – it is also against the law
- × Disturb any place used by bats, whether they are present or not





# Nesting Birds

Talk 6

## Did you know?

***It is illegal to kill or disturb birds or damage their nests or eggs***

- While birds usually nest in trees or hedges they can also be found nesting on the ground, in equipment, amongst materials, in cabins, under eaves or behind drain downpipes
- All birds are protected when nesting and work must be stopped



## When is bird nesting season?

Most birds tend to build nests and lay their eggs between March and July. The peak months for breeding are May and June. However, some birds can nest all year round.



## Why does this matter?

- A fine of up to £5000 may be given for each offence, each bird may be deemed a separate offence
- Any vehicle that is involved in the damaging or destruction of birds, their eggs or their nests, may be forfeited

***Bird nesting surveys must be carried out before work commences and any active nests clearly marked with an exclusion zone.***

## Do

- ✓ Check that no nesting birds or active nests are present before carrying out site clearances of potential nesting sites
- ✓ Stop all construction and work in the immediate area if nesting birds are present
- ✓ Report the presence of nesting birds to a supervisor

## Do not

- ✗ Kill, injure or capture any wild bird
- ✗ Take, damage, destroy or disturb a nest or eggs of any wild bird
- ✗ Move any machinery, scaffolding or equipment if birds are found nesting

# Dormice

Talk 7

## What are they and how are they recognised?

Dormice are small, orange-brown rodents with a white belly and a furry tail. Their body is about 60 mm to 90 mm long plus tail. They have large black eyes and round ears. The fat (or 'edible') dormouse is an introduced species found in southern and central England. It is grey and larger in size. Always consult an expert to confirm the species of dormouse that has been found. This toolbox talk deals with the dormouse, or more correctly the hazel dormouse, only.

**It is illegal to injure, kill, capture, or disturb a dormouse, or to damage its nests or any place it uses for shelter or protection. If a dormouse or its nest has been found, stop works in the area immediately and consult an expert.**



## Where are they found?

Dormice typically live in well-established, broad-leaved woodland and thick hedges where there is plenty of ground cover. However, they are also now being found in other types of woodland, for example coniferous woodland, and in scrub. Dormice are nocturnal, spend most of their time above ground in trees and shrubs and live in very low numbers, so sightings are rare. It is more likely that signs, including nests and nibbled hazelnuts, are seen than the animals themselves.

Nests are up to 150 mm wide, round and woven out of grasses and leaves. They may be found within scrub and trees, in hedgerows and tree holes, and sometimes in buildings. Winter hibernation nests are often at ground level under leaf litter, wood-piles or rocks.

## When are they found?

Dormice are only active between May and early October, but nests may be found all year round.

### Penalties

Breaking the law can lead to fines of up to £5000 per offence and, potentially, prison sentences of up to six months. Any vehicle used to commit the offence may be forfeited. Both the company and/or individuals can be held liable.

# Working Around Trees And Hedgerows

Talk 8

## Did you know?

Trees and hedgerows are an important part of the environment and the countryside. They provide a vitally important habitat for wildlife and many trees and hedgerows are protected by legislation enforced by the local authority. They provide shelter and pathways for insects, amphibians, mammals and birds.



## What do you need to do?

Always check:

- Before felling any trees or removing any hedgerows to ensure permission has been obtained
- Before excavating near to trees and hedgerows
- For nesting birds and if any are found stop work immediately

## Why does it matter?

### You can cause environmental harm

During certain times of the year trees and hedgerows may contain nesting birds. Nesting birds are protected by law against disturbance.

### You can be prosecuted

It is illegal to cut down or wilfully damage trees protected by law under a Tree Preservation Order, trees in a conservation area or to pull up certain countryside hedges except with the consent of the local planning authority.

### There is a safety risk

Damaged trees may become unstable and potential hazards and can kill or injure people or animals. Trees can be damaged by compaction of roots and other damage to the root system, by pollution and through impact by machines.

## Do

- ✓ Check what protection is required for trees and hedgerows before you start work.
- ✓ Ensure plant and machinery is kept out of any excluded areas.
- ✓ Store all fuels and oils and other potential pollutants away from root systems.
- ✓ Hand dig only around root systems.

## Do not

- ✗ Undertake tree felling or hedgerow clearance without permissions in place
- ✗ Never undertake tree felling or hedgerow clearance during the bird nesting season.



# Himalayan Balsam

Talk 9

## Did you know?

***Himalayan Balsam is one of the most invasive species in the UK as it dominates habitats, grows densely and shades out native plants***

- It thrives because each plant produces more than 500 seeds before it dies in the autumn. When the seed pods are ripe, the slightest touch causes them to burst open catapulting and dispersing the seeds up to seven metres away
- It is often found growing along rivers, disused railway lines or in similar linear corridors



## How is it identified?

- It grows up to 2.5 metres during spring to autumn
- The stem is pink/red, hollow, sappy and brittle. Leaves occur in two's or three's from the same point on the stem. They are spear shaped with serrated edges, shiny and dark green with a reddish mid-rib.
- Flowers, which are similar to a Foxglove or a large Busy Lizzie, are purplish pink, carried on long stalks and appear from June to October.

## Why does it matter?

It is illegal "to plant or otherwise encourage" the growth of Himalayan Balsam. This could include cutting the plant or roots and disturbing or moving surrounding soil that may contain root material unless as part of an eradication process.

## Do

- ✓ Immediately stop any work within seven metres of the suspect plant and report it

## Do not

- ✗ Enter an area of Himalayan Balsam during treatment
- ✗ Disturb the seedpods.
- ✗ Excavate or move soil that may contain seeds or other plant material without specific instruction
- ✗ Stockpile any material suspected of containing Himalayan Balsam within ten metres of gullies, watercourses or drains



# Japanese Knotweed

Talk 10

## What?

- ❑ Japanese Knotweed was originally introduced to the UK as an ornamental plant, but has spread extensively in the wild
- ❑ it grows rapidly more than 20 mm a day, it forms dense clumps over 3 m high, which crowd out and prevent the growth of native plants
- ❑ the rhizome root system, from which new plants grow, can extend several metres away from the original plant and be up to 2 m deep
- ❑ the plant spreads so rapidly not only through progression of its root system, but because any fragments of its stem or root will grow to form a new plant (a piece as small as 0.8 grams can regenerate) making it very difficult to eradicate
- ❑ grows in any type of soil no matter how poor and is often found along railways, river-banks, roads and particularly on derelict sites
- ❑ can grow through joints in tarmac and mortar and disrupt infrastructure.



## Identification

- ❑ forms dense clumps and grows up to 3 m tall
- ❑ the stem is hollow, it looks like bamboo and breaks easily
- ❑ in spring it is fleshy and red tinged and in summer it is green with purple speckles
- ❑ leaves in spring are pinky red and uncurl as the stem grows
- ❑ in summer leaves become large oval or heart shaped midgreen
- ❑ flowers are cream coloured and appear in drooping clusters towards the end of August
- ❑ the plant dies before November often leaving behind the upright brown, hollow, woody stems.

## Why?

- ❑ **avoid environmental harm:** it shades out native plants by producing a dense canopy of leaves early in the growing season. Although not toxic to humans or animals, it offers a poor habitat for insects, birds and mammals
- ❑ **avoid prosecution:** it is illegal "to plant or otherwise encourage" the growth of Japanese Knotweed. This could include cutting the plant or roots and disturbing or moving surrounding soil that may contain root material unless as part of an eradication process
- ❑ **avoid structural damage:** the plant is strong enough to grow through foundations, walls, roads and drainage pipework.

## Questions

- 1 Why is Japanese Knotweed a problem in the UK?
- 2 Where is Japanese Knotweed on this site?
- 3 What can be done to stop Japanese Knotweed spreading?

## Do

- ✓ **IMMEDIATELY** stop all work within 7 m of the suspect plant and contact a line manager for instructions if it is thought Japanese Knotweed has been identified
- ✓ inform a line manager if you notice damage to the fencing enclosing Japanese Knotweed.

## Don't

- ✗ enter an identified area of Japanese Knotweed during treatment

- ✗ excavate or move any soil from within 7 m of a Japanese Knotweed plant without instruction
- ✗ double handle material suspected on containing Japanese Knotweed, but if this is unavoidable do so on an impermeable surface
- ✗ stockpile material suspected to containing Japanese Knotweed within 10 m of watercourses, gullies or drains
- ✗ track plant through Japanese Knotweed – it will cause it to spread.

# Washing Down Plant & Machinery

Talk 11

## Did you know?

Washing down plant and machinery, hosing down concrete truck mixers or degreasing engines can all lead to serious pollution incidents if it is not carried out correctly.

Contaminated water could discharge directly into local streams, rivers or other watercourses.



Surface water entering drains and road gullies could also encourage the spread of invasive weeds to new areas.

## What can you do?

- Check that there is a place designated for washing down plant and machinery
- Ensure that any wash down slurry/residue is contained and cannot enter watercourses, gullies or drains

## • Remember

### It can cause environmental harm

Dirty water can contain mud, grease, oils, invasive weeds, toxic chemicals and other materials. These pollutants could kill fish and other aquatic life and may also seriously affect the surrounding environment.

### You can be prosecuted

It is an offence to allow polluting matter to enter a watercourse, gully or drain. It is also illegal to cause invasive weeds to spread to new areas.

### Costs can be high

The cost of cleaning up a pollution incident can far exceed the cost of putting proper control measures in place.

## Do

- ✓ Check with a supervisor before using degreasing or cleansing solutions – don't just assume they can be used.
- ✓ Report any washing down that may cause a pollution incident.
- ✓ Ensure waste slurry/mud (invasive weeds) is disposed of appropriately.

## Do not

- ✗ Use any more water than is necessary – reduce waste.
- ✗ Use anywhere other than the designated place for washing down plant and machinery.



# Storage of Waste

Talk 12

## Did you know?



Untidy, polluted sites are unsafe sites. They can cause nuisance to neighbours and give a poor public image of what we do.

Allowing waste to escape into the atmosphere also has the potential to pollute the environment.

## What can you do about it?

- Keep sites tidy and collect waste regularly
- Use a skip with a lid or cover them with sheets or nets to prevent dust and litter being blown out
- Place liquid hazardous waste containers within bunds or on drip trays
- Do not throw materials into the wrong container/skip
- Do not burn or bury waste – it's illegal
- Do not give waste away, all waste taken off site needs to be accompanied by paperwork



## Why does it matter?

### You can be prosecuted

It is the responsibility of all waste producers to prevent their waste escaping into the environment and to store waste appropriately.

### But you can also save money through:

- The reduction of disposal costs and landfill tax payments by preventing the contamination of inert wastes
- Re-using and recycling materials
- Seeing how much of each type of waste is being produced and where efforts to reduce waste need to be targeted

## Do

- ✓ Use waste containers or skips suitable for the type of waste being stored.
- ✓ Check that containers and skips are not corroded or worn out to minimise the risk of accidental spillages or leaks.
- ✓ Ensure labels on containers and skips are kept in good order.
- ✓ Locate skips away from watercourses, gullies and drains.

## Do not

- ✗ Mix hazardous with non-hazardous waste – it's illegal.
- ✗ Give waste away, all waste taken off site needs to be accompanied by paperwork.

# Spill Control

Talk 13

To be read with Spillkit Toolbox Talk

## Did you know?

Accidental releases of oils and chemicals from construction sites make up a large number of the pollution incidents that occur each year.

It is important that everyone on site knows what preventive measures are in place on their work site and how to control a spill to minimise its impact.



## What can you do?

- Take part in annual spill response drills to ensure you understand what to do in the event of a spill
- Ensure that you have the correct spill clean-up equipment on site
- Dispose of all contaminated materials correctly
- When you clean up a spill, use absorbent granules/pads. Large pools of oil or spills that cannot be absorbed should be removed by a gulper
- Do not ignore spills – **stop work and take action immediately**
- However, do not tackle spills if it is not safe to do so

## Why does this matter?

### You can harm the environment

Spills spread very quickly and can cause damage to the environment

### You could face prosecution

Fines and clean-up costs can be expensive.

## Do

- ✓ If possible and safe to do so contain the spill in accordance with the spill plan.
- ✓ If spillage is flammable, extinguish/remove all sources of ignition.
- ✓ Protect sensitive areas (e.g. watercourses or surface water drains), and use drain covers or earth and sand to construct a bund.

## Do not

- ✗ Hide the incident – ensure it is reported to and that controls implemented.
- ✗ Hose down spills of concrete or cement into surface water drains.



# Segregation of Waste

Talk 14

## Did you know?

Separating wastes into hazardous, non-hazardous and inert for disposal can help minimise costs and maximise the opportunities for recovery and recycling of wastes.



Standard signs are being introduced across the UK to encourage and improve the segregation of waste.

## Why does this matter?

### You can cause environmental harm

Incorrectly disposing of hazardous waste could cause pollution and damage habitats. Landfills and waste treatment centres are specially designed to handle specific wastes without causing environmental harm.

### You can be prosecuted

It is illegal to mix hazardous waste with other waste types that are to be sent directly to landfill. A fine of up to £20,000 and imprisonment for up to five years could be incurred.

### You can re-use some waste

Separating wastes can maximise recycling and can also allow certain types of waste to be recycled and reused on site.

## Do

- ✓ Where possible separate wastes into the different types.
- ✓ Check what skips there is on site and ensure the correct wastes are placed in the correct skips.
- ✓ Close lids or doors on skips to prevent waste getting wet or escaping.
- ✓ Ask your supervisor for advice if unsure about correct waste segregation on site.

## Do not

- ✗ Overfill skips.
- ✗ Put liquids and flammable liquid wastes into skips.
- ✗ Mix non-hazardous and hazardous waste.

# Pumping and Water Contamination

Talk 15

## Did you know?

Excavations often require the pumping out of any rainwater or groundwater. However, this water may contain silt and/or other contaminants so must not be discharged into watercourses, gullies, drains or sewers without a permit or prior authorisation.



Incorrect disposal could result in pollution of controlled waters including rivers, streams, groundwater, lakes or the sea.

## Why does this matter?

### You may cause environmental harm

- Water pumped from excavations can be muddy and could be contaminated. It can cause serious pollution to watercourses
- Over pumping is often required to maintain flows of sewage. If this is allowed to escape it may find its way into a watercourse and can have a devastating effect on wildlife

### You can be prosecuted

It is illegal to allow polluted water to enter watercourses, gullies or drains, even where consent to pump has been gained.

### You can cause flooding

If water is discharged into a sewer or gully of insufficient capacity then flooding will occur. This can also cause pollutants to enter watercourses or create flooding in worksite or on adjacent land.

## Do

- ✓ Check with a supervisor what treatment systems are required before final discharge of pumped out water before pumping.
- ✓ Regularly check that any treatment systems are working and that water being discharged is clear of any pollutants and not causing damage.
- ✓ Report it immediately if:
  - Pollution is occurring.
  - The discharge is causing flooding.
  - Pipework is damaged.
- ✓ Check that the point of discharge is in the correct location to the sewer, manhole or gully.
- ✓ Check that all couplings and other pipework fittings are secure.

# Noise and Vibration

Talk 16

## Did you know?

Noise and vibration can disturb local residents and give rise to complaints and delay your project.

Repeated exposure to noise can also cause irreversible damage to your hearing. Always wear the correct PPE including ear defenders.



## What can you do about it?

- Keep noise to a minimum – no shouting and care to be taken when unloading tools and equipment. Whenever possible, deliveries to site should be during the day
- Locate noisy equipment such as generators away from people's homes or screen off or enclose equipment
- When arriving on site, arrive quietly, ensure that vehicles are not left running, radios are turned off and doors are not slammed
- Generator doors must also be kept shut whenever they are running
- Make sure that all plant and equipment is well maintained and regularly serviced. Plant and equipment in good order will always be quieter than poorly maintained equipment
- Switch off all plant and equipment immediately after use
- If a member of the public approaches you to make a complaint that you cannot deal with, ask them to call the National Helpline on **03457 11 41 41**.



## Why does this matter?

**You can be prosecuted** for failing to meet noise constraints.

**The local authority has the power to stop works** if noise from the site is causing a nuisance.

## Do

- ✓ Ensure that neighbours have been pre-notified of any works.
- ✓ Be respectful to our neighbours if they voice concerns. Ask them to call the National Helpline
- ✓ If possible, restrict noisy activities to certain times of the day – some sites are only consented to work at certain times.
- ✓ Minimise drop heights and other noisy activities

## Do not

- ✗ Make more noise than is absolutely necessary particularly during unsocial hours.
- ✗ Undertake activities that could cause damage to nearby structures through vibration.

# Storage of Fuel and Oil

Talk 17

## Did you know?



Incorrect storage, lack of care during refuelling, vandalism and poorly maintained plant can all result in a fuel spillage.

Bulk fuel and oil storage tanks need to be bunded and the bund should have a capacity of 110% of the tank. All containers of oil and fuel should also be kept in a secure, bunded area.

## Why can you do?

- Regularly check tanks, containers and bunds for damage and leaks
- Lock containers and tanks when not in use
- Ensure a spill kit is provided adjacent to fuel storage
- Never pour waste fuel or oil down drains
- Do not store fuel and oil, or carry out refuelling, within ten metres of a watercourse or drain.

## Why does it matter?

### You can cause environmental harm

Even a small spillage of oil or fuel can cause damage to the environment and harm plants, animals, fish, and humans.

### You can be prosecuted

A spillage or the incorrect storage of fuel or oil can result in a prosecution, a fine, and damage to your company's reputation.

### The costs can be excessive

Spillages are likely to lead to be clean-up costs, which can be significant, often several times greater than the fine.

## Do

- ✓ Supervise all fuel and oil deliveries.
- ✓ Place a drip tray or absorbent mat under all plant during fuelling.
- ✓ Use a funnel when refuelling small plant.
- ✓ Use an automatic shut off or pistol grip delivery system when refuelling plant.
- ✓ Arrange for the removal of contaminated water from bunds and trays by an appropriate contractor.

## Do not

- ✗ Locate fuel and oil tanks/storage area near to vehicle routes.



# Dust and Air Quality

Talk 18

## The Facts

Dust, odours and other emissions can cause health risks, particularly at very high concentrations.

Dust can also damage vegetation and crops and effect on local wildlife and watercourses.



## What can you do?

- Clean up or damp down any spillage of dry dusty materials
- Store any bulk cement and bentonite in silos, and position silos and stockpiles away from residential areas or watercourses
- Store fine dry materials within buildings or provide adequate protection from the wind
- Ensure cutting and grinding operations are adequately shielded or wetted

## Why does it matter?

### It can cause environmental harm

Emission of dark smoke from plant, chimneys and fires is illegal. Dust can damage the ecology of a watercourse and affect plant growth

### It can delay your project

Regulators have the power to stop works if dust or other emissions are causing a nuisance

### It's a health hazard

Dust can be carcinogenic and may cause eye irritation or make asthma worse. Odours may cause nausea, dizziness or fainting.

### We need to respect our neighbours

Dust can settle on neighbours' properties and vehicles. Poorly controlled emissions and odours from plant or works may lead to valid complaints

## Do

- ✓ Sheet over lorries carrying dry materials to or from site.
- ✓ Keep to site speed limits.
- ✓ Use a wheel wash if it is appropriate.
- ✓ Make sure dust suppression systems are working and are effective on crushers and screeners.
- ✓ Report and Close Call it if work activities are causing poor air quality.

## Do not

- ✗ Burn materials on site without approval.
- ✗ Leave plant and vehicles running if not in use.
- ✗

# Road Sweeper Arisings

Talk 19

## What are Road sweeper arisings?

Road sweeper arisings are the materials that the road sweeper picks up while being used. This could include harmful or contaminated material.

If not disposed of properly they can be deposited and transported around and off the worksite by plant and other site vehicles.



## What can you do?

- Always use the correct procedure for disposing of sweeper arisings
- Do not dispose of arisings into or near drains or watercourses as this may cause pollution
- Do not use a road sweeper to clean up oil, fuel or chemicals spills – use the appropriate spill kit

## Why does this matter?

### It can cause environmental harm

Inappropriate discharge of arisings may result in water or ground contamination as the arisings may contain harmful substances such as fuel residues or road salt.

### You could be prosecuted

Waste producers have a responsibility to dispose of arisings at an appropriate facility.

## Do

- ✓ Use a road sweeper to keep site accesses clean and free from mud and standing water.
- ✓ Report it if arisings have or are being disposed on inappropriately on or off site.

## Do Not

- × Dispose of arising on site unless authorised.
- × Allow deposit of arisings directly on to bare ground.



**Site Waste Management Plan  
(SWMP)**

Heol y Glyn, Glyn-neath  
Neath Port Talbot SA11 5AU

1. **Project** - Development of 80 new homes.
2. **Site Manager** – D Sauro
3. **Location** – Heol y Glyn, Glyn-neath, Neath Port Talbot SA11 5AU
4. **Nature of Project;**

- Construction of 80 new homes with associated external works; drainage, mains services connections, car parking, servicing, landscaping
- There is access for delivery vehicles of all sizes along designated routes, with no restrictions for access or egress. Arrival and departure of all vehicles are monitored and controlled by the site manager.

## 5. **Project Aim**

At Enzo's Homes Ltd, we are committed to fulfilling our aim of constructing high quality homes whilst ensuring our project environmental plan and the SWMP is effective, accurate and economical, and also ensuring that all and any procedures put into place are working, monitored and maintained and comply with Waste Duty of Care Code of Practice, November 2018.

Waste stream specific targets are given below:

Material	Waste group code	Benchmark figure (per dwelling)	Target (per dwelling tonnes)
Concrete	170101	12% (2.52t)	4% (0.85t)
Timber	170201	15% (0.41t)	9% (0.25t)
Gypsum (plasterboard)	170802	17% (0.42t)	14% (0.35t)
Plastics	170203	4% (0.06t)	3% (0.05t)

## 6. **Management**

The Site Manager is the SWMP co-ordinator of this project, and is responsible for ensuring the site inductions of all workers, implementation and overseeing of the SWMP. The Site Manager will also monitor the effectiveness and accuracy of the SWMP on site. All waste streams shall be documented and recorded by the Site Manager, with all records held within the Site office. All records are also copied and held within Enzo's Homes head office.

## 7. **Organizational Structure.**

Position	Name	Contact Details
Director	Enzo Sauro	01269 597155
Site Manager	D Sauro	07974 139509

## 8. **Distribution**

The Site Manager shall retain a copy of this plan within the site office, and a further copy shall be held within the Company head office. Further copies shall be supplied to any Subcontractors where applicable or relevant. This circulation shall be repeated in the event of any updating of the plan.



## **9. Instruction & Training**

The Site Manager will provide an induction to any persons working upon the site, and documented evidence of this will be stored within the site office. The induction shall cover appropriate handling, separation, recycling, reuse and/or disposal route of any waste at each stage of the Project. All subcontractors will be instructed and expected to follow the requirements of the SWMP. Daily register recordings of all subcontractors are held within the site office, controlled by the Site Manager.

## **10. Waste Management on Site**

Waste upon the site will be generated from either materials brought onto, or from those materials already present on site.

Imported materials will only be brought onto the site for inclusion into the fabric of the project, either in buildings or groundworks.

Existing site material is topsoil, subsoil and mixed concrete rubble. All waste is segregated on site, with those having potential for reuse being stored on site, covered and away from any watercourses. The remainder being the concrete rubble pile which will be removed from site under the waste carriers licence. All waste removals to be handled by S J Griffiths & Son Ltd, Reg'd Number CBDU015913 Bryniestyn Tirycoed Road Glanamman Ammanford Sir Gaerfyrddin SA18 2YL, Reg'd Co No. 10970307, Expiry: 18/08/2022

Waste Transfer Notes containing details of:

- Waste Carrier
- Carrier Registration Number
- Issuing Body
- Driver Details
- Vehicle Registration Number
- Current Holder of Waste Details (name/address/site details/site manager details)
- Description of Waste & load details/size
- Tipping Facility Details/Company/Site Address/Site Number/Date Tipped
- A further note shall be issued detailing the total loads carried on each day

Records detailing the further mapping of this waste once leaving this site can be supplied by the agent.

## **11. Minimising Hazardous Waste**

Waste minimization upon the construction site will be achieved by a variety of methods, each of which will be discussed between all contractors working upon site, and monitored throughout works by the site Manager.

These will include the following:

- Good housekeeping of all hazardous waste generating materials used
- Minimizing the supply of raw materials held to prevent overstocking and overuse.
- Structured job allocation to allow maximum usage of hazardous materials at one time, thus reducing waste.
- Adequate labelling and storage of hazardous materials to prevent loss via contamination or spillage. This includes regular inspection of containers and sealing devices.

- Review of and retention on site of all MSDS (material safety data sheets) to ensure sufficient competency regarding the usage of hazardous substances is in place.
- Instigate and monitor upon site a regime for reporting inadvertent or unavoidable hazardous spillage or leakages, to ensure prompt and sufficient clean up when necessary.

## 12. Prioritising Wastes requiring waste Management enabling

Waste types eg bricks	Waste category	European Waste codes EWC	Origin of waste
Concrete	Inert	17 01 06	Construction
Tarmac	Inert	17 03 01	Construction
Bricks / Blocks	Inert	17 03 06	Construction
Timber	Active / Bio	17 02 01	Construction
Subsoils	Inert	17 05 04	Site Re-grading
Plasterboard	Active / Bio	17 08 02	Construction
Packaging *see notes below		15 01 01 *1 15 01 02 *2 15 01 03 *3	Construction
General/mixed construction waste		17 09 04	Construction
Glass	Inert	17 02 02	Construction

\* Notes for Packaging Codes: \* (1) 15 01 01 - EWC - Paper & Cardboard \*(2) 15 01 02 - EWC - Plastic \*(3) 15 01 03 – EWC - Wooden

## 13. Ways of minimising waste

Enzo's Homes Ltd, have, from an early stage, looked at how we can minimise the waste produced as a result of our activities on site and through our working practices, thus reducing the amount of waste to be removed from the Project. All of our subcontractors are actively encouraged to undertake the same approach within their own work centres.

## 14. Current actions table

Action	Responsibility	Date actioned	How notified
Plasterboard sheets are made to a standard size, wall heights designed to accommodate board size and reduce cut waste	Design team		Construction team meetings
Wash down points away from watercourses and the main construction area, one way site plan with separate entry and exit points for vehicles ensuring no waste being spread off site by vehicles	Site Manager Suppliers		Supplier meetings / site inductions
Substructure forward planning, ensuring all pre-mixed concrete brought onto site can be utilised without generating waste	Site Manager Contractors / build team		Contractor / build team meetings.

Materials brought onto site once unloaded off pallets, the pallets are stored and removed from site when sufficient quantity to do so, packaging consigned to the appropriate skips	Site Manager suppliers		Supplier meetings
Apply all identified environmental risk & actions identified within the Construction Phase Plan	Site Manager (CDM Coordinator)		Method Statements Risk Assessments SWP CPHSP
Document safe storage, recording, accessible when necessary	Site Manager		Site inductions

All of the above act to reduce the amount of waste and surplus materials, which traditionally would be skipped and sent through ultimately to landfill. We are continually identifying waste minimisation techniques, and actively encourage all site persons to participate in waste reduction practices. Any amendments or additions to the above table will be updated in due course as notified in item 8.

## 15. Segregation

An area away from any watercourses is provided and identified to facilitate the separation of waste materials to facilitate recycling, salvage, reuse and return. Actual waste materials are then entered into separate skip containers for removal from site. Further segregation is carried out by the waste contractor at their own waste facility. All site workers and subcontractors are made aware of the waste container identification system. Current skips are:

- Wood (for unrecyclable material)
- General mixed Construction waste
- Plasterboard
- Hazardous

Whilst not all skips may be in place at all times, and any additional skips required will be brought onto site when necessary, eg paper and cardboard.

## 16. Waste materials management

Waste materials generated fall into 3 categories for management;

- Re-use
- Recycle
- Removal

### Re-use

If surplus materials can be re-used in the site works, they are classified as *materials*, subject to re-use. If they are surplus to requirements at the site, and need to be removed from site, they can be removed and stored away from the site for ***re-use in their present form***.

## Recycling

If the surplus material cannot be re-used in its present form, but could be used in a different form, it may be recycled for re-use on site, or sent for **recycling via the appointed waste agent**.

## Landfill

If either of the above cannot be satisfied, then the only remaining option is to send **via the appointed waste agent for landfill**.

### 17. Waste Management cycle

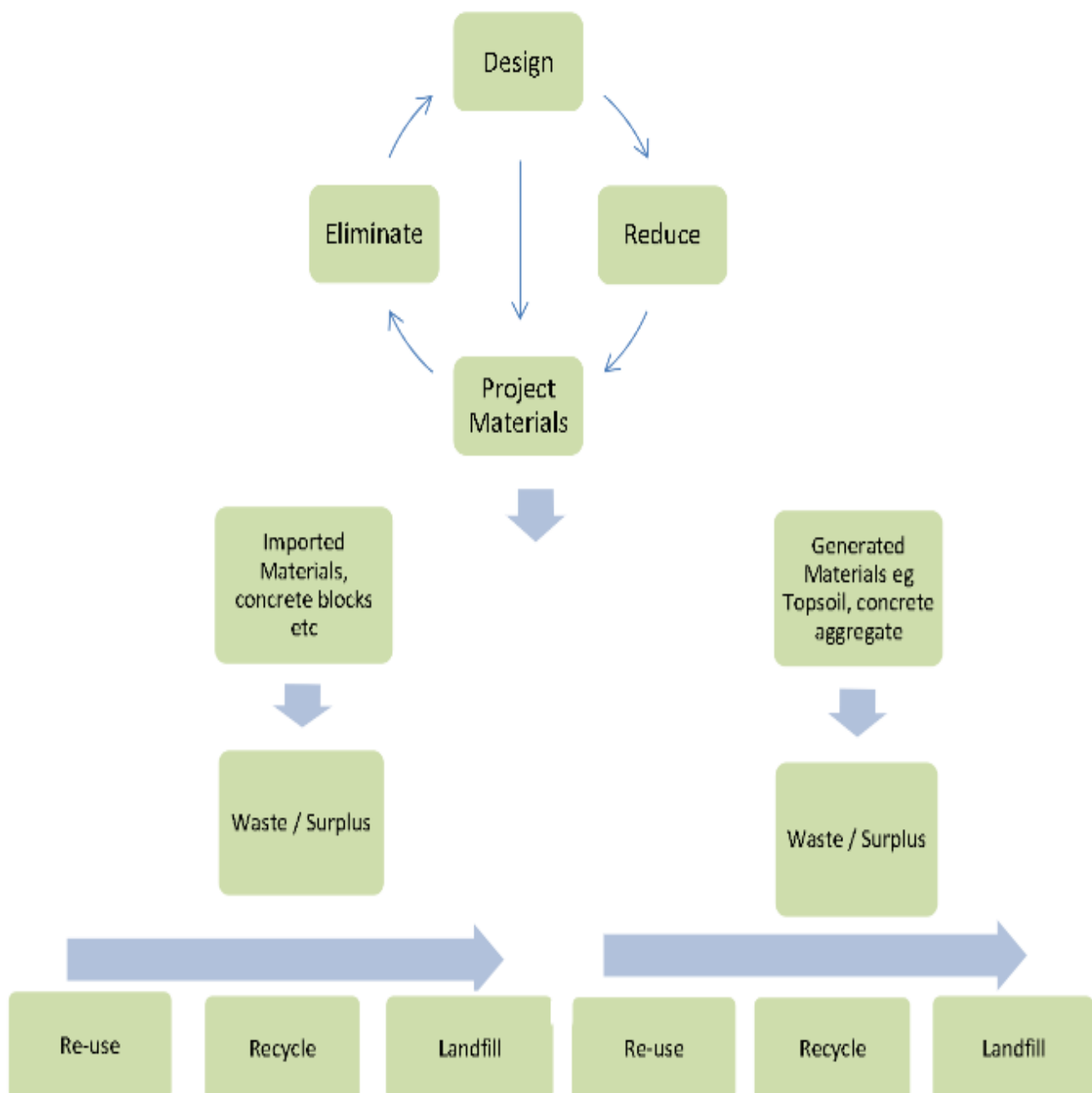


Table for Waste Types & Waste Management Packages

Waste works	Waste Stream
<b>Enabling works</b>	
Subsoils	Re-use on site
<b>Construction works</b>	
Plasterboard	Return / recycle
Bricks / blocks	Recycle / re-use
Timber	Re-use/ recycle
Cardboard	Recycle
Mortar	No use to skip
Metals	Recycle
Paints	Recycle
Soils	Re-use
Plastics	Re-use / recycle
Roof Tiles	Re-Use

All skips on site will be monitored to ensure that contamination of segregated waste does not occur. We will therefore advise regularly on how the waste management system is working. This will have a financial benefit in addition to the waste reduction / management, as direct to landfill skips will have a higher charge than a segregated skip of waste.

We will endeavour to continually review our waste stream processing with a view to reducing our waste production to the point that landfill is our last resort.

The SWMP will be communicated to the whole Project team, and in the event of any changes.

#### SITE WASTE MANAGEMENT PLAN (SWMP) IMPLEMENTATION CHECKLIST

Checks – please tick yes or no	Yes	No
Have terms and commercial rates been agreed with contractor (s)?		
For offsite or disposal are all the waste destination details verified?		
Has a waste designated area been prepared		
Has the waste area been signposted?		
Has the SWMP document control / filing system been set up?		
Have all necessary staff and contractors had the SWMP passed to them?		
Have all the SWMP training / induction processes been met?		
Has the SWMP training / induction process for subcontractors been met?		
Has the SWMP been approved by the Site Manager / Directors?		
<b>Comments / further actions</b>		

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**Relevant Signatures**

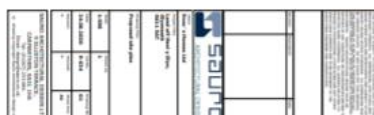
**Director**

**Date:**

**Site Manager**

**Date:**

Enzo's Homes Ltd

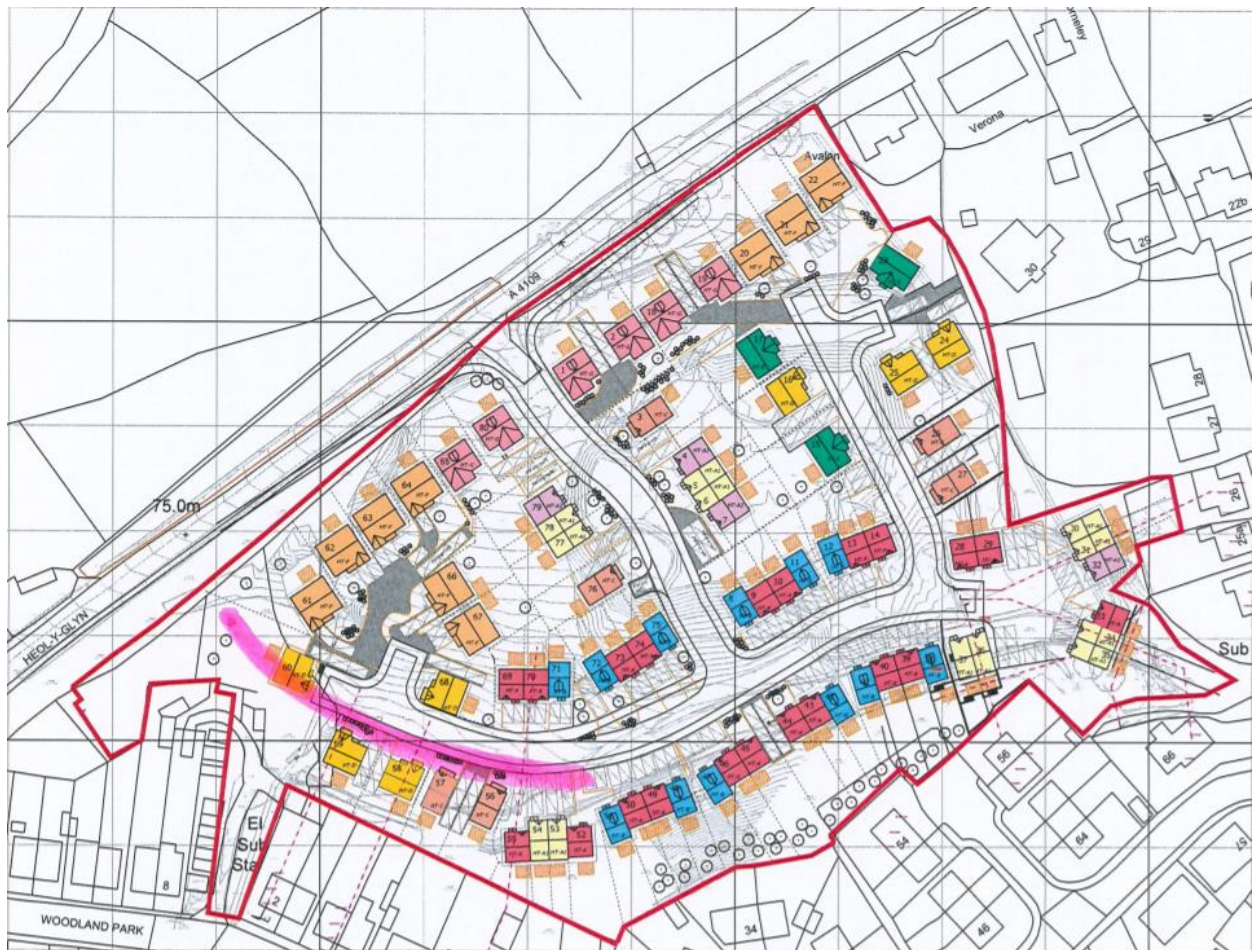




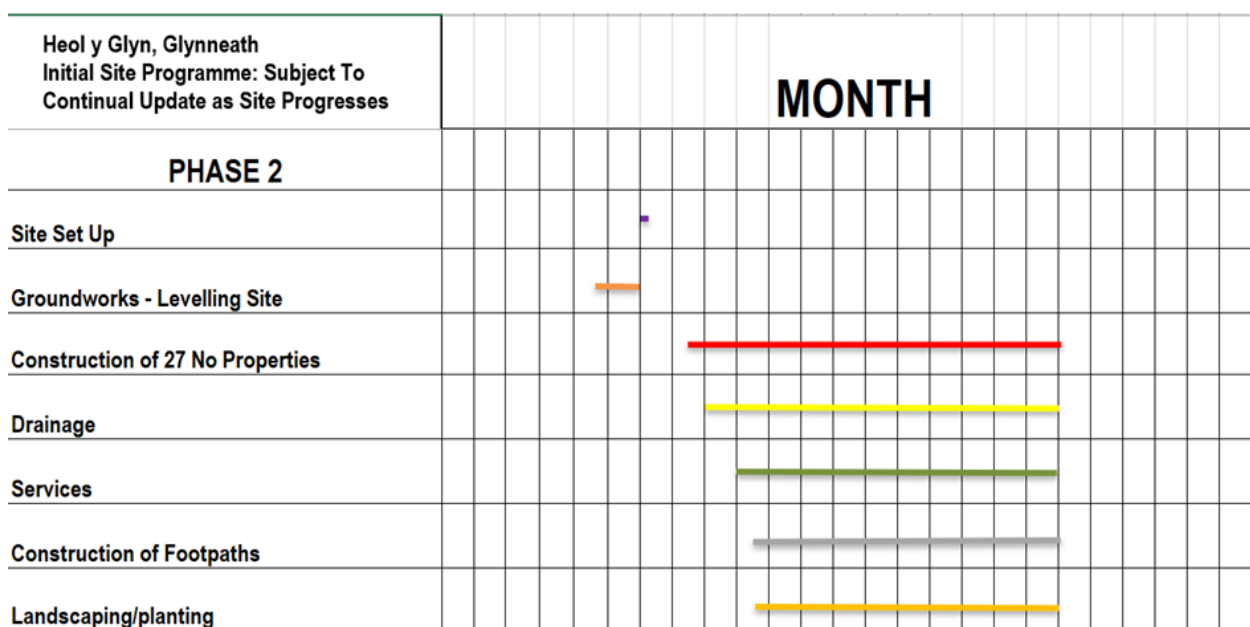
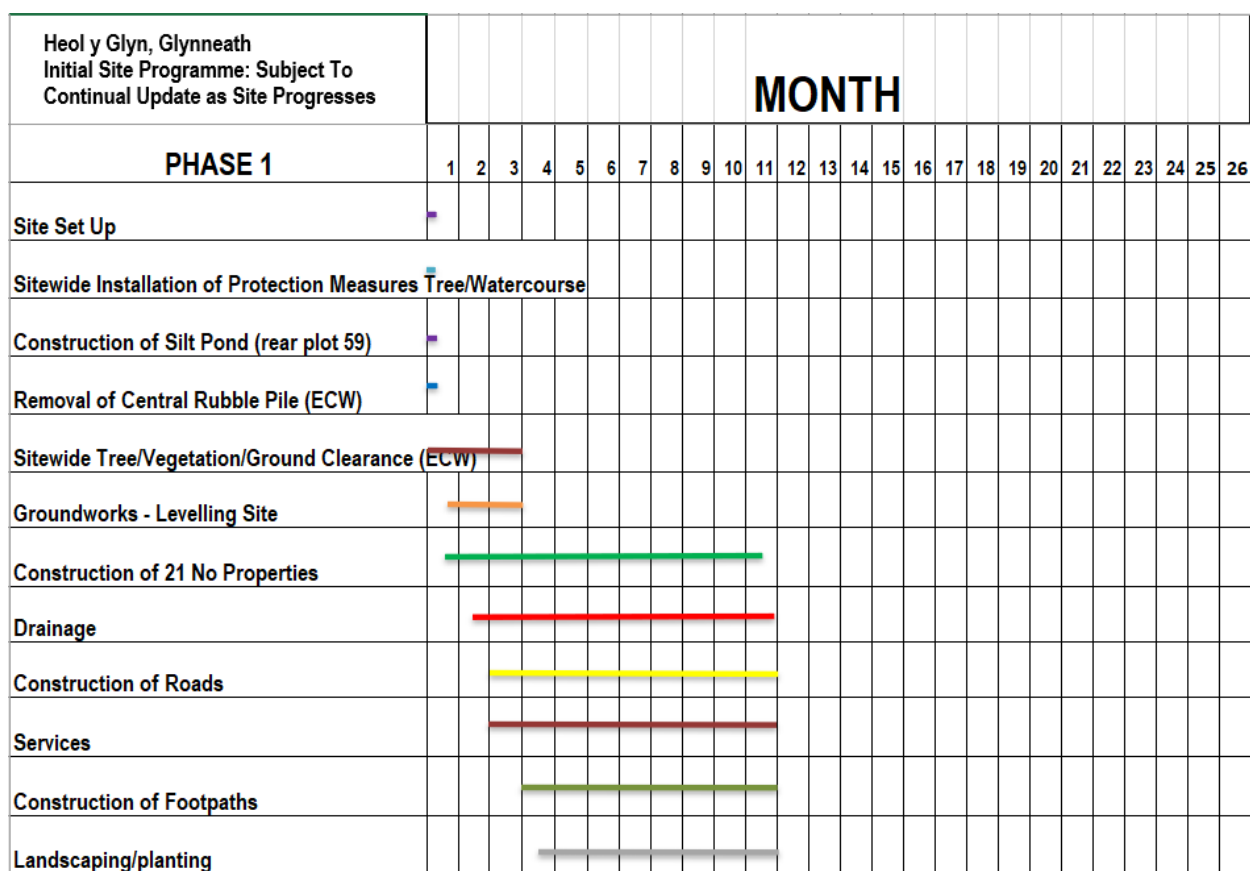
Phasing:

- Phase 1
  - As identified on the plan which will comprise the first 21 units, and highway throughout the site.
  - will also comprise drainage works and the culverting of the existing watercourse to a point just short of the proposed connection point to the SW of plot 59 on the Sauro layout plan. As a result of this, a purpose built silt pond will be proposed as a final point prior to formal discharge into the existing connection point to the SW.
- Phase 2
  - As indicated on the plan and will be serviced by the pre-built infrastructure from Phase 1.
- Phase 3
  - As indicated on the plan and will be the 'southern plateau'.
  - Plot 59 will be the final plot to be completed on the site as a result of the silt pond being present and needed until the culvert is officially connected to the existing connection point as per the drainage plan. Once this is completed, Plot 59 will be completed.

App. 14 Pink Line Denoting Reptile Fencing



# App. 15 Estimated Programme of Works



[illegible]