

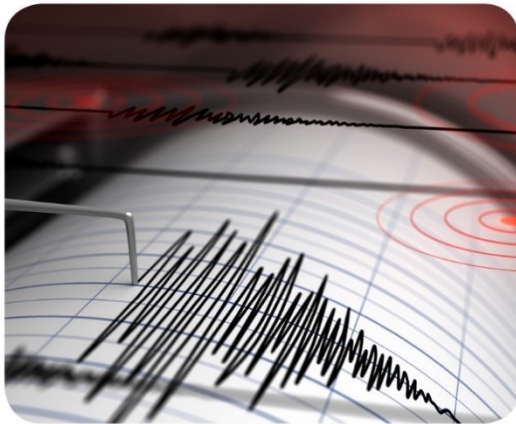


Bridge Industrial

Weybridge Business Park, Weybridge

Framework Construction Environmental Management Plan

October 2022



Bridge Industrial

Weybridge Business Park, Weybridge

Framework Construction Environmental Management Plan

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Bridge Industrial

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1 Introduction

- 1.1.1 Air & Acoustic Consultants Limited (AAC) have been commissioned by Bridge Industrial to prepare a Framework Construction Environmental Management Plan (CEMP) for the proposed industrial development at Weybridge Business Park.
- 1.1.2 The purpose of this CEMP is to outline the overarching details and principles in order to minimise, manage and/or mitigate the environmental effects of the demolition and construction phase works associated with the Proposed Development.
- 1.1.3 The CEMP details the environmental management, controls and safety procedures that will need to be adopted during the development of the Site, thereby providing a tool to ensure the successful management of the likely environmental effects as a result of the construction activities. The CEMP seeks to ensure that all enabling, demolition and construction works cause the minimum disruption to the local residents and members of the public, as well as local ecological receptors and sites of importance. More specifically, the CEMP sets out the site-specific environmental management procedures per environmental discipline, thereby providing all personnel involved in the works with a clear indication of the roles they are to undertake, the mitigation to be incorporated and commitments to be adhered to throughout the demolition and construction phases. This Framework CEMP has been prepared to enable Runneymede Borough Council (RBC) and third parties to understand the nature of the standard environmental management and control measures that all to be implemented during the Development of the Site.
- 1.1.4 Once appointed, the Principal Contractor will refine the Framework CEMP to ensure that the document is specific to the works and processes that are to be employed by contractors during all enabling, demolition and construction activities, thereby creating a Site-specific CEMP for the Development of the Site. The Site-specific CEMP will be subject to approval by RBC which will be subject to and secured by suitably worded planning condition.
- 1.1.5 While this Framework CEMP includes all works involved for the development of the Site, i.e. enabling, demolition and construction, should the Applicant appoint different Principal Contractors to undertake only one element of the works, i.e. demolition, this Framework CEMP can be refined to create a Site-Specific Enabling or Demolition Environmental Management Plan (EEMP) (DEMP) for those works. This would then form part of the Site-Specific CEMP. The Framework CEMP demonstrates the commitment of the Applicant to undertaking the development of the Site in such a way as to avoid or minimise environmental effects and disruption to neighbours (commercial and residential), and provides a mechanism for the implementation of recommended mitigation measures and monitoring throughout the works.
- 1.1.6 This Framework CEMP includes the following (in no particular order):
- **Site information** - including description of the Site, surrounding environment and Proposed Development, as well as environmental management structure, roles and responsibilities;
 - **Enabling, Demolition and Construction Information** - a description of the anticipated enabling, demolition and construction works based on the information available to date, anticipated programme and phasing, working hours, details of haulage routes, equipment to be used, etc.;
 - **Environmental Management and Control Measures** - potential environmental issues related to: the enabling, demolition and construction works, details of the site inspection and audit programme, methods for managing environmental risks and reducing impacts, emergency procedures, waste

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and hazardous materials storage procedures, liaison with the local community. Specific project environmental procedures relating to: waste and materials management, dust and air quality, noise and vibration, vehicle management, protection of water quality; and describes mitigation measures for the demolition and construction phase(s); and

- **Monitoring** – procedures for recording and reporting monitoring results and taking remedial action in the event of any non-compliance.

1.1.7 Following the appointment of the Contractor for the works it will be their responsibility to maintain and update the Outline CEMP and to produce the final CEMP for the construction works. The final CEMP will require to be certified to BS EN ISO14001 Environmental Management Systems – specification with guidance for use (BSI, 2004). The final CEMP will set out the Contractor's roles and responsibilities, together with appropriate control measures, training and briefing procedures, risk assessments, stakeholder engagement and monitoring systems to be employed during planning and constructing the works for all relevant topic areas.

2 The Final CEMP

2.1 Roles and Responsibilities

- 2.1.1 The Construction (Design and Management) Regulations 2015 (CDM Regulations) came into force on 6th April 2015, replacing CDM 2007. As per the requirements of the CDM Regulations, the Applicant must appoint a Principal Designer and Principal Contractor prior to the commencement of works on-Site. Should the Applicant fail to appoint either a Principal Designer or Principal Contractor, the Applicant must carry out their duties in respect of the CDM Regulations.
- 2.1.2 The roles and responsibilities of the Applicant, Principal Designer and Principal Contractor, as required by the CDM Regulations, are not outlined within this Framework CEMP and will be confirmed in writing upon the appointment of the Principal Designer and Principal Contractor by the Applicant.

2.2 Management Structure

- 2.2.1 Responsibility for all environmental issues relating to the redevelopment of the Site rests with the Applicant, the Principal Designer and Principal Contractor appointed for the Development; individual responsibilities will be divulged throughout the management team relating to the co-ordination of inspection, monitoring or reporting. Such individual responsibilities are outlined below.
- 2.2.2 The Principal Contractor will have the central role in managing Safety, Health, Environment and Quality (SHEQ) issues during enabling, demolition and construction activities. The Principal Contractor and all sub-contractors will have to implement the environmental management and control measures set out within the CEMP.
- 2.2.3 All works are to be carried out in compliance with the Construction (Design and Management) Regulations 2015, current legislation and guidance, and Applicants requirements.
- 2.2.4 A full contact list containing names, job titles and contact numbers of the project team members shall be produced and maintained where required. This should include details of the Applicant's Environmental Representatives.

2.3 Individual Requirements

- 2.3.1 The duties of the Principal Designer, Project Manager, Construction Manager, Works Manager, Environmental Manager/Representative and other personnel are detailed below:

Principal Designer (can be the Applicant /or nominated party)

- Review and approve the site-specific CEMP;
- Submit site-specific CEMP to RBC for approval;
- Assign appropriate resources to construction activities; and
- Undertake regular site inspections which will include compliance with environmental requirements.

Project Manager (can be the Principal Designer)

- Allocate appropriate project resources to deal with environmental issues;
- Submit site-specific CEMP to RBC for approval;

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- Assign appropriate resources to construction activities; and
- Undertake regular site inspections which will include compliance with environmental requirements.

Works Manager (part of Principal Contractor team)

- Understand the major environmental constraints and implications for the project;
- Ensure that the need for compliance with environmental issues is communicated to the rest of the project team and sub-contractors;
- Act on findings of internal and external audits;
- Ensure complaints are being addressed and responded to;
- Ensure appropriate pollution response provision is made;
- Report to Senior Management (Principal Designer/Project Manager) on any environmental breaches; and
- Implement and maintain the operation of the CEMP.

On-Site Environmental Manager / Representative (part of Principal Contractor team)

- Implement and maintain the CEMP;
- Understand the environmental issues associated with the project;
- Maintain and review the environmental risk register;
- Co-ordinate and maintain consultation with the RBC, local residents/businesses, and other interested parties on environmental issues including complaints process;
- Maintain the complaints log;
- Comply with the CEMP;
- Ensure environmental audits are carried out and pursue any corrective actions;
- Report on environmental incidents to Senior Management and Environmental Regulators as required;
- Co-ordinate with the Project Manager, regular reviews of the CEMP during the project to ensure its continued effectiveness throughout construction activities; and
- Co-ordinate environmental awareness training and ensure relevant responsibilities are included within site induction.

Health and Safety Advisor (note: could be same as Environmental Manager/Representative)

- Undertake regular site inspections;
- Carryout audits at regular intervals defined within the CEMP; and
- Provide advice and support to Project Management Team.

Environmental Specialists

- Relevant specialists will be employed, if necessary, during the project to undertake specialist monitoring, undertake surveys and advise the construction staff.

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Collective Responsibilities

Project Management Team (Outlined above, including Works Manager, Sub-Agents, Quantity Surveyors, Site Engineers, Section Foremen) and Sub-contractors

- Comply with the CEMP;
- Maintain CEMP document control system;
- Implement the requirements of the CEMP and its supporting documents on-site;
- Report immediately to Environmental Representative/Manager on any environmental incidents;
- Ensure site personnel are aware of their environmental obligations and have undergone site environmental awareness training;
- Implement the action necessary to resolve non-compliance issues; and
- All subcontractors should comply with the CEMP, its operational control and procedures while on site.

All Personnel – to be communicated during induction training

- Comply with all operational controls and working procedures implemented by this CEMP;
- Undergo environmental awareness training;
- Report to supervisor immediately on any environmental incidents; and
- Suggest potential modifications and improvements to CEMP.

2.4 Key Contacts

2.4.1 [Table 2.1](#) outlines the Key Contacts and their roles within the works.

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Table 2.1: Key Contacts

Role	Name	Contact Details
Bridge Industrial	TBC	TBC
Development Partner(s)	TBC	TBC
Principal Construction Contractor	TBC	TBC
Structural Engineer	TBC	TBC
Environmental Consultant	TBC	TBC
Project Manager	TBC	TBC
Site Manager	TBC	TBC
Environmental Manager	TBC	TBC
Health and Safety Officer	TBC	TBC
Community Liaison Manager	TBC	TBC

3 General Framework and Administration

3.1 Public Liaison

3.1.1 Contractors should provide RBC Environmental Inspectors with a full programme of key activities for the development before it starts.

3.1.2 The specific measures to be implemented by the Contractors will include:

- The Contractor will liaise with the RBC Environmental Inspectorate on a regular basis, agreeing routine arrangements for each site's activities and ensuring compliance;
- The Contractors will be responsible for establishing and maintaining contact with RBC and local residents; keeping them informed of construction matters likely to affect them;
- This liaison will include the regular and frequent distribution of Newsletters and attendance at meetings at the request of RBC with representatives of local businesses and residents' groups. (See under community relations below);
- The Contractors will provide an information and reporting telephone 'Hot Line' staffed throughout working hours. Information on this facility shall be prominently displayed on site hoardings. The Contractors' nominated persons will attend monthly reviews with RBC' Environmental Inspectorate, or otherwise as requested;
- The Contractors will facilitate RBC' Environmental Inspectors to undertake regular planned inspections of the site to check compliance and associated records; and
- The Contractors will provide RBC with full programmes, providing details on the nature and timing of the main site activities. The contents of these programmes are specified in the following section.

3.2 Community Liaison

3.2.1 Appropriate contact with neighbours and the general public throughout the enabling and construction programme will be pro-actively maintained, with the issuing of a brief news sheet on progress and regular update meetings on no less than on a quarterly basis. Update sheets will be maintained on site hoardings.

3.2.2 The Contractors will nominate community relations personnel, who will be focussed on engaging with the local community. The Contractor will ensure that occupiers of nearby properties and residents are informed in advance of works taking place, including the estimated duration. The Contractors will inform local businesses and residents likely to be affected by such activities at least 14 days prior to undertaking the works, as well as applying for the appropriate permits and licences, e.g. vehicle crossovers or parking bay suspension.

3.3 Neighbour and Public Relations Strategy

3.3.1 To successfully develop and implement a '*Neighbour and Public Relations Strategy*,' the following actions could be undertaken:

- Initial Contact: Once full planning permission has been obtained and contractors have been appointed, formal contact will be established with the nearest neighbours and those who could potentially be affected by the enabling and construction works; and

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- Contact during Works Period: A single point of contact for neighbour and public relations will be established, with a senior member of the project staff nominated for the role. Contact details for this single point of contact will be displayed on the site hoarding. Outside normal working hours, site security will act as the main point of contact via a dedicated phone number. Security will alert the staff contact if necessary (available 24 hours). Should there be any complaints, these will be logged, fully investigated and reported to the relevant department within RBC as soon as possible. The complainant will be informed as to what action has been taken.

3.4 Emergency Incident Communication

- 3.4.1 In the case of work required in response to an emergency, RBC and all neighbours will be advised as soon as reasonably practicable that emergency work is taking place. Potentially affected occupiers will also be notified of the 'hotline' number, which will operate during working hours.

3.5 Construction Staff and Training

- 3.5.1 All site construction staff to be made aware of the requirements of the CEMP and will be made responsible for its implementation. Regular training is to be implemented where deemed appropriate, and in response to non-compliance incidents. Staff will also be notified of any updates to the CEMP.

3.6 Health and Safety

- 3.6.1 The Principal Contractors will prepare and implement a project Specific Health and Safety Plan. This Plan is to be provided to, and agreed with, the RBC (and other relevant parties as required).

4 The Site and Project

4.1 Site and Surrounding Area

- 4.1.1 The Application Site is located West of the main conurbation of Weybridge and on the eastern boundary of the main conurbation of Addlestone.
- 4.1.2 The Application Site is split into two separate parcels as shown in [Figure 4.1](#). The National Grid Reference for the centre of the site is, TQ 23327 77845 (British National Grid Coordinates E: [523327](#), N: [177845](#)).
- 4.1.3 The northern parcel covers an area of approximately 1.1 ha, and the southern parcel covers an area of approximately 2.6 ha. The northern parcel formerly occupied by Toshiba, and existing structures and associated external car parking areas are still in place. The southern parcel has gone through recent renovations to update the previous 1980's business park. In 2016, a planning application (ref:RU.16/1678) was approved for the refurbishment and extensions to Units 4-8, including a part demolition to provide two separate two storey office buildings; and the demolition and redevelopment of Unit 9 to provide a new three storey B1 office building within the southern part of Weybridge Business Park; retaining the associated car parking (261 spaces) and landscape improvement works. Now known as Units 4, 5 & 6, the refurbishment was completed in 2017.
- 4.1.4 The northern parcel is bounded to the north and east by scrubland, Addlestone Road, River Wey and residential dwellings to the south-east and Link Road / commercial premises to the west. The southern parcel is bounded to the north by Addlestone Road, to the east by the River Wey and Blackboy Farm, to the south by existing commercial premises, and to the west by Hamm Moor Lane.
- 4.1.5 The Site is not located within or adjacent to any Conservation Areas and does not contain statutory listed or non-statutory locally listed buildings.
- 4.1.6 The Site is located within a former commercial and industrial area, with current surrounding uses comprising a mix of light industrial, residential, commercial, education, transport and leisure.

Figure 4.1: Site Location



4.2 Development Proposals

4.2.1 The development proposals seek to deliver the demolition of existing buildings and the development of three employment units within Classes E(g)ii, E(g)iii, B2 and B8, with ancillary office accommodation, new vehicular access, associated external yard areas, HGV and car parking, servicing, external lighting, hard and soft landscaping, infrastructure and all associated works., as illustrated in [Figure 4.2](#).

4.2.2 The three employment units within Classes E(g)(ii), E(g)(iii), B2 and B8 land uses are totalling 16,925 m² Gross Internal Area (GIA). The breakdown of the three units GIA are as follows:

- Unit 100 – 13,859 m²
- Unit 210 – 1,411m²
- Unit 220 – 1,655m²

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Figure 4.2: Proposed Site Layout



5 Enabling and Construction Overview

5.1 Programme of Works

5.1.1 The anticipated construction programme is not fully understood at the time of writing. As discussed in Section One of this CEMP, once appointed, the Principal Contractor will update the Programme of Works section to make it specific to the works and construction methods utilised on Site.

5.1.2 The applicants current programme is:

- Planning Re-Submission – October 22
- Planning Approval – February 23
- JR Period Completion – mid April 23
- Prepare Tender Documents – October 22
- Tendering – November 22 – January 23
- Tender review – February 23
- Appoint Contract – February 23
- Start on site – April 23

5.1.3 Once a Principal Contractor is appointed, they will confirm the timeline for the following:

- Demolition;
- Foundations;
- Sub-structure;
- Super-structure;
- Groundworks;
- Internal fitout;
- External works
- Fencing; and
- Planting.

6 General Construction Management

6.1 Introduction

- 6.1.1 This section outlines the requirements relating to site management practices, ranging from the location of accommodation and equipment to the operation of specific equipment on Site. It outlines procedures that should be implemented during site operations to minimise the impacts on receptors and the environment. These relate to working hours, site layout & appearance, and good housekeeping.
- 6.1.2 Representatives from the Contractors and RBC should regularly inspect the construction site to ensure that these procedures are followed. The Contractors must follow a 'good housekeeping' policy at all times.

6.2 Working hours

- 6.2.1 Working Hours will be as directed by the Planning Consent and are expected to be:
- 08.00 to 18.00 Monday to Friday
 - 08.00 to 13.00 Saturday
 - No working on Sundays, Bank or Public Holidays
- 6.2.2 To ensure that the impact of the enabling and construction is kept to a minimum, we propose that the contractors should submit a Section 61 prior notice to RBC.
- 6.2.3 The following enabling activities shall be permitted to take place within the period before and after normal working hours as outlined above:
- Arrival and departure of workforce on site;
 - Deliveries and unloading;
 - Check and examinations of plant and machinery (including test running) and the carrying out of essential repairs / maintenance to plant and machinery;
 - Site inspections and safety checks; and
 - Site clean-up.
- 6.2.4 No continuous 24-hour activities are envisaged for works and any working on Sundays or Bank Holidays will be subject to reasonable notice. Any change to working hours will be agreed in advance with RBC.
- 6.2.5 These hours will be strictly adhered to unless or in the event of:
- An emergency demands continuation of works on the grounds of safety;
 - Minor internal works are being carried out within the confines of the building envelope; and
 - Completion of an operation that would otherwise cause greater interference with the environment /general public if left unfinished

6.3 Good housekeeping

- 6.3.1 The Contractors will:
- Ensure considerate site behaviour of the Contractors' staff;

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- Ensure the noise from lorry reversing alarms and the like is kept to minimum levels;
- Prohibit open fires;
- Ensure that appropriate provisions for dust control and road cleanliness are implemented;
- Remove rubbish at frequent intervals, leaving the site clean and tidy;
- Frequently inspect, repair and re-paint as necessary all site hoardings to comply with the conditions of RBC Licence – all flyposting and graffiti is to be removed as soon as reasonably practicable and within 24 hours of notice from authorities;
- Maintain toilet facilities and other welfare facilities for its staff;
- Remove food waste;
- Prevent vermin and other infestations; and
- Undertake all loading and unloading of vehicles as identified on the logistics drawings.

6.4 Public Information

6.4.1 The site hoarding will display all necessary health & safety material. This will be maintained and updated where required.

6.5 Security

6.5.1 The Contractors will ensure that the Site is secure and will prevent unauthorised entry to or exit from the Site. Site gates will be closed and locked when there is no site presence.

6.5.2 Alarms will incorporate an appropriate cut-out period. Access and egress will be via controlled security gates.

6.6 Hoardings, Site Layout and Facilities

6.6.1 The Site will be completely secure to deter public access. The proposed hoarding line and gates will be in accordance with RBC licencing requirements. It is intended to provide protection from noise and dust at all times through the erection of encapsulating scaffolds, climbing screens and physical barriers as appropriate to the task.

6.6.2 Site welfare arrangements will be established inside the site boundaries, together with a site office space.

6.7 Construction Plant and Equipment

6.7.1 A detailed list of plant and equipment to be used will be provided in the Site-Specific CEMP once the Principal Contractor has been appointed.

6.8 Construction Compound and Material Handling / Storage

6.8.1 The final location/s of the construction compound and material storage areas will be confirmed upon appointment of the Principal Contractor.

6.8.2 The detailed construction compound layout plan will show the following:

- Parking areas for Site operatives and visitors;
- Loading and unloading areas;

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- Plant and machinery storage area;
- Material storage area; and
- Welfare facilities.

6.8.3 Plant and equipment will be stored in areas which are less susceptible to possible pollution incidents, or on dedicated hard standings.

6.8.4 Hazardous substances, such as diesel, oil, chemicals, cement, cleaning materials and paint, used during the construction process have the potential to cause serious pollution. Therefore, environment agency pollution prevention guidance (PPG) will be followed (although withdrawn). Of particular relevance are the following PPGs and replacement guidance series, guidance for pollution prevention (GPPs):

- PPG1: Understanding your environmental responsibilities – good environmental practices (July 2013);
- PPG2: Above ground oil storage tanks (January 2017);
- PPG5: Works or maintenance on or near water (October 2007);
- PPG6: Working on construction and demolition sites (March 2012);
- PPG7: Safe storage – the safe operation of refuelling facilities (July 2011);
- PPG8: Safe storage and disposal of used oils (February 2004);
- PPG21: Pollution incident response planning (March 2009); and
- PPG22: Incident response – dealing with spills (April 2011).

6.8.5 Access to the hazardous storage area will be restricted to those people who are authorised to do so and have adequate training.

6.8.6 It is recommended (where possible) prefabrication will be adopted extensively with components being brought to Site in premanufactured sections where possible. Large volumes of materials will be required, calling for the highest level of delivery and handling management.

6.9 Emergency Planning and Response

6.9.1 The Contractors will develop a plan for emergencies to incorporate:

- Emergency procedures including emergency pollution control to enable a quick response;
- Emergency phone numbers and the method of notifying RBC and statutory authorities. Contact numbers for the key staff of the Contractors will also be included. The Contractors will display a 'contact board' on the hoarding identifying key personnel with contact addresses and telephone numbers, so that members of the public know who to contact in the event of a report or query;
- Surrey Fire & Rescue Service requirements for the provision of site access points;
- Site Fire plan and management controls to prevent fires; and
- A plan to reduce fire risk and potential fire load during construction, operation and subsequently during maintenance or repair. The project will comply with any third-party requirements as may be appropriate.

6.10 Access and Egress Gates

6.10.1 Site access gates will be located for each site as appropriate.

6.11 Considerate Constructors Scheme

6.11.1 The Site will be registered with the 'Considerate Constructors Scheme.' This scheme ensures that contractors carry out their operations in a safe and considerate manner with due regard to neighbours, passing pedestrians and road users.

7 Traffic Management

7.1 Construction Logistics Plan

7.1.1 A Construction Logistics Plan (CLP)¹ has been prepared by mode transport planning. The CLP will ensure that a strategy for planning of the construction access routes will be implemented to take into account current legislation, police, fire authority and health and safety executive guidance, local authority transport schemes and neighbourhood lorry restrictions.

7.1.2 In addition, the CLP will be reviewed and maintained and updated in line with the construction programme and is expected to include details of the following:

- Timing controls (e.g. limiting peak period vehicle movements);
- Temporary and permanent access to the works for personnel/vehicles;
- Traffic management procedures for waste disposal vehicles;
- Personnel and vehicle segregation;
- Equipment (e.g. road cones, temporary fencing and signage);
- Provision to ensure that vehicles can be loaded and unloaded off the public highway where possible;
- All staff will be encouraged to use public transport to travel to and from the Site;
- Heavy Goods Vehicle (HGV) wheels will be washed prior to vehicles leaving the site;
- Road sweepers will be used on adjacent roads to the site at an appropriate frequency depending on the stage of construction to keep the roads clean and free from debris/mud; and
- Neighbouring businesses, construction sites and statutory bodies (e.g. TfL) will be consulted and kept informed as to the construction and traffic management proposals.

7.2 Access and Haul Routes

7.2.1 Directional signage will be implemented to ensure that construction traffic utilises designated routes to minimise the effect on the surrounding road network. Locations of temporary signage for the approved route will be discussed with the RBC highway officer.

7.2.2 HGV movement's will be restricted as far as reasonably possible so as to avoid peak traffic flow periods (i.e. from 08.00-09.00 and 17.00-18.00).

7.2.3 All construction traffic entering and leaving the Site will be closely controlled and during delivery times, traffic marshals will be positioned at the egress / ingress point to control and record entry and exit movements.

7.2.4 The site will be served by unloading/loading bays internal to the site, which will be accessed via Addlestone Road. It is envisaged that access to the site will be restricted via the main arterial routes near to the site, which are the A317 and A320 to the west which connects to the M25 (London Orbital Road) to the northwest.

¹ Mode Transport Planning, 2022. Bridge Point Weybridge, Weybridge. Project Number: J326431

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7.3 Site Parking

- 7.3.1 On-site parking for construction workers will be restricted to an absolute minimum. This will only be made available to those construction personnel who need to carry heavy equipment or materials to the Site. Unapproved parking on public roads will not be allowed and staff will be encouraged to use public transport to avoid parking on streets in the local area. Any local traffic management measures for site access will be agreed with the RBC prior to demolition / construction commencing.
- 7.3.2 All contractors will be encouraged to make use of the bus services that route along Weybridge Road, which is to the north of development site. The promotion of using buses and national rail network will be undertaken by the contractor.

7.4 Loading and Unloading

- 7.4.1 All goods deliveries will be directed to a designated area on-site where all vehicles will be unloaded, and the materials taken to the appropriate storage area.

7.5 Vehicle Cleaning Facilities

- 7.5.1 Wheel washing facilities could be utilised on site by using a pressure washer made available on site, as well as road sweeping if necessary.
- 7.5.2 The contractor will enforce measures to avoid any debris on the carriageway. These measures will include ensuring all vehicles carrying waste material are sheeted or damped where appropriate.

8 Site Waste Management

8.1 Introduction

- 8.1.1 The handling and disposal of waste produced on Site will be subject to the Duty of Care under the Environmental Protection Act (1990), as well as the company Environmental Management Policy. It is the joint responsibility between the Principal Contractor and the Applicant to ensure that waste produced on the Site is disposed of in accordance with the current, relevant legislation. The transportation of waste to and from the Site will also comply with the Duty of Care requirements.
- 8.1.2 Due to the nature of the existing structures on site, waste will be produced during the demolitions and construction phases. However, using the waste hierarchy (elimination, reduction, re-use, recycling and disposal), and using the WRAP's Halving Waste to Landfill initiative, impacts associated with waste can be minimised.

8.2 Eliminate

- 8.2.1 The Development will seek to maximise the re-use of materials generated on-site, where possible, in order to eliminate the need for waste disposal as much as possible. This is mostly during the earthwork phase, where existing materials around the site will be re-used, avoiding the need to import and export material.

8.3 Reduction

- 8.3.1 In order to reduce the amount of waste on site, a number of measures will be taken, including:
- Minimising the amount of goods and materials stored on site to avoid damage (implement a just-in-time delivery system),
 - Efficient design specification of standardised components/materials.
 - Paying attention to material quantity requirements to avoid over ordering and generation of waste materials; and
 - Prioritising preassembled and prefabricated construction materials, wherever practicable, to minimise on-site generation of waste and packaging and reduce the number of delivery and collection vehicles to and from the Site;

8.4 Re-Use

- 8.4.1 The development will make use of the existing materials on Site that make up the existing buildings; many will be made of materials that can be re-used during the foundation and construction works, such as brick, timber etc.

8.5 Recycling

- 8.5.1 Material that cannot be re-used for the development will be recycled where possible. Certain materials, such as brick, timber, plastics, glass and metals have a feasible recycling value, and therefore this will be utilised on Site.
- 8.5.2 Materials will be separated, where possible, into separated marked skips to ensure efficient recycling can take place. Furthermore, discussion with licensed waste carriers in respect to the feasibility and efficiency of specific materials recycling will be conducted.

8.6 Disposal

- 8.6.1 A mineral import/export register should be implemented on site, under the Materials Management Plan (MMP), to track and manage soils. This will allow soil waste to be reduced as far as reasonably practical.
- 8.6.2 Certain materials on site may not be suitable for re-use or recycling, and therefore they will need to be disposed of. In this case, a Site Waste Management Plan should be prepared. This material will be accumulated and taken off site as soon as practically possible; the waste material will not be allowed to accumulate on site. All non-Hazardous wastes will be placed into open waste skips, which will be sheeted over prior to being transported off site. Transfer notes will be issued for each consignment.
- 8.6.3 Some of the waste materials on site may be hazardous to both human and ecological receptors. Where any hazardous waste is to be handled for disposal, this shall be carried out in accordance with developed risk assessments. Where a potentially hazardous waste cannot be identified then a waste management company or consultants will be employed to determine what the substance is, the required control measures for handling it, means of transportation and method of disposal.
- 8.6.4 All generated hazardous wastes will be disposed of in accordance with the Hazardous Waste Regulations (Amended) 2009 and in accordance with Section 34 of the Environmental Protection Act Duty of Care and its required documentation procedures and bearing the site Producer Code, which is issued by the Environment Agency. All Hazardous Wastes will be placed into secure sealed waste skips and disposed of in accordance with the Hazardous Waste Regulations 2009 Duty of Care consignment note procedures, copies of which will be maintained within the project files for future reference. All identified hazardous wastes will be removed and placed into separate secure and sealed waste bins which will be located within their own area.

9 Air Quality, Dust, Odour and Dirt

9.1 Introduction

9.1.1 During the demolition and construction phase(s), there will be various Site clearance works and activities undertaken, which all have the potential to generate particle emissions arising from dust and smoke.

9.1.2 The main sources of particle emissions during construction activities include:

- Demolition;
- Haulage routes, vehicles and construction traffic;
- Materials handling, storage, stockpiling, spillage and disposal;
- Site preparation, earthworks and restoration after completion;
- Construction, excavation and fabrication processes; and
- Internal and external finishing and refurbishment

9.1.3 A construction dust assessment has been undertaken in [Section 5](#) of the Air Quality Assessment and the outcome of which has been utilised within this section to advise upon the adequate level of mitigation that will be required.

9.1.4 A range of measures are suggested, which could be utilised during the construction phases are set out below. These have been outlined in the Institute of Air Quality Management (2016)² *Guidance on the Assessment of Dust from Demolition and Construction* document and should be used to reduce the impacts of the demolition and construction phases on the local sensitive receptors.

9.2 Demolition

- Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust);
- Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground;
- Avoid explosive blasting, using appropriate manual or mechanical alternatives; and
- Bag and remove any biological debris or damp down such material before demolition.

9.3 Earthworks

- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable;
- Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable; and
- Only remove the cover in small areas during work and not all at once.

² Institute of Air Quality Management, 2016. *Guidance on the Assessment of Dust from Demolition and Construction*.

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9.4 Construction

- Avoid scabbling (roughening of concrete surfaces) if possible;
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place;
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery; and
- For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.

9.5 Trackout

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use;
- Avoid dry sweeping of large areas;
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport;
- Record all inspections of haul routes and any subsequent action in a site logbook; and
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

9.5.1 The following general mitigation measures are based on 'Medium Risk' sites, which has been determined in the Construction Dust Impact Assessment as set out in AAC's Air Quality Impact Assessment.

9.6 Communications

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site;
- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager;
- Display the head or regional office contact information; and
- Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk, and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. In London additional measures may be required to ensure compliance with the Mayor of London's guidance. The DMP may include monitoring of dust deposition, dust flux, real time PM₁₀ continuous monitoring and/or visual inspections.

9.7 Site Management

- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken;

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- Make the complaints log available to the local authority when asked; and
- Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.

9.8 Monitoring

- Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of site boundary, with cleaning to be provided if necessary;
- Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked;
- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions; and
- Agree dust deposition, dust flux, or real-time PM₁₀ continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.

9.9 Preparing and Maintaining the Site

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible;
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site;
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period;
- Avoid site runoff of water or mud;
- Keep site fencing, barriers and scaffolding clean using wet methods;
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site ensure they are kept covered; and
- Cover, seed or fence stockpiles to prevent wind whipping.

9.10 Operating Vehicle/Machinery and Sustainable Travel

- Ensure all vehicles switch off engines when stationary - no idling vehicles;
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable;
- Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate);

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- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials; and
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

9.11 Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems;
- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate;
- Use enclosed chutes and conveyors and covered skips;
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate; and
- Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

9.12 Waste Management

- No bonfires and burning of waste materials.

10 Noise & Vibration

- 10.1.1 Operators should be properly trained in the use of equipment, made aware of any noise mitigation requirements, and where necessary, be supervised so that reasonable care is taken to minimise their noise impact. BS 5228-1:2009+A1:2014 provides advice on minimising noise from construction activities with the implementation of Best Practicable Means (BPM).
- 10.1.2 Prefabricated materials eliminate the need for cutting, machining or drilling. Where practically possible the use of prefabricated materials is preferable.
- 10.1.3 Where cutting, machining or drilling is required materials should be taken away from sensitive receptors to be worked on. Where this is not possible protection of the receptor will be required, for example, by using temporary acoustic shields.
- 10.1.4 Early notification / discussion with existing neighbours for any noisy works likely to take place is essential. Site Management teams will undertake to monitor and ensure practicable measures have been considered in Contractors Risk Assessments and Method Statements to mitigate against disturbance.
- 10.1.5 The contractor will regularly brief the construction staff so that they are considerate of the surrounding residents and operate construction plant in a manner which controls noise (where practicable). Once the exact construction methods and plant to be employed are confirmed, any required mitigation measures will be identified. Such measures could include:
- Avoidance of the use of horns and excessive revving of engines;
 - Vehicles, generators, concrete pumps, air compressors and other constant noise sources being turned off when not required, or at least throttled back to a minimum;
 - Plant to operate at low speeds, where possible, and incorporate automatic low speed idling;
 - Selection of 'silenced' plant and equipment where practicable;
 - Locating noisy plant and equipment as far away from sensitive receptors as reasonably possible;
 - Reducing impulsive noise generating activities such as slamming doors, noisy brakes, impacts etc.;
 - Screening either in the form of localised temporary acoustic fencing where the distances between source and receptor cannot be managed, or on the Site boundary; and
 - All plant being properly maintained (greased, blown silencers replaced, saws kept sharpened, teeth set and blades flat, worn bearings replaced, etc.).

11 Ground Conditions & Contamination

- 11.1.1 Work will be carried out in accordance with relevant CDM regulations 2015, details of these measures will be presented within the pollution response plan (PRP), and the CLP
- 11.1.2 All the workers on site will be made aware of potential contamination issues on the site during the induction and will use best practice techniques during all construction activities. An Emergency Response Plan (ERP) will be prepared by the Principal Contractor and all staff will be made aware of its contents and procedures.
- 11.1.3 Details of the materials to be imported to Site during the development will be provided by the Principal Contractor once appointed. It will include details of. construction materials to be used on Site, i.e., the create construction platforms or subsoil/topsoil for landscaped areas.
- 11.1.4 These materials must be subject to environmental and geotechnical testing to confirm suitability for use on Site. No material shall be permitted without going through the correct testing.
- 11.1.5 The operation of construction vehicles and the handling, use and storage of hazardous materials will be undertaken as follows:
- Vehicles and plant will be well maintained to prevent accidental pollution from leaks;
 - Static machinery and plant will include drip trays beneath oil tanks / engines / gearboxes / hydraulics, which will be checked and emptied regularly via a licensed waste disposal operator;
 - Refuelling will be undertaken in specified areas;
 - Drip trays will be installed to collect leaks from diesel pumps;
 - The handling, use and storage of hazardous materials will be undertaken in line with the current best practice;
 - Adequate bunded and secure areas with impervious walls and floors, with a capacity of 110% of substance volume, are to be provided for the temporary storage of fuel, oil and chemicals on site during construction. Valves and trigger guns will be protected from vandalism and kept locked up when not in use;
 - Provision of spill containment equipment such as absorbent material on site;
 - The appropriate utility company will be consulted on the potential requirement for an oil interceptor and sediment trap at the point where site surface water run off enters the sewerage network;
 - Store all construction, oil, fuel and diesel materials as far from the nearby water bodies and drainage as possible; and
 - A spillage Emergency Response Plan (ERP) will be produced in advance of commencement on site which site staff will be required to have read and understood. On site provisions will be made to contain a serious spill or leak through the use of booms, bunding and absorbent material.
- 11.1.6 A member of staff will be nominated to control and monitor the Control of Substances Hazardous to Health (COSHH) system. Suppliers must send data sheets for every hazardous substance to the site. Supervisors and safety managers will brief staff members who will be using hazardous materials, on its safe use, disposal and any emergency procedures. Written records of these briefings will be kept in the COSHH file held on the site and updated accordingly.

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- 11.1.7 A COSHH/fuel inventory will be maintained, and key contacts listed to be notified in the event of a significant pollution incident, which may subsequently lead to the contamination of controlled waters, Directly and indirectly purchased bulk fuel and COSHH items will be stored (in lockable COSHH stores) in accordance with the relevant EA PPG/GPPs. Tanks and dispensing pumps will be locked when not in use to prevent unauthorised access. Information regarding spill prevention and disposal of COSHH items will be provided as part of the standard Site induction presentations and during regular toolbox talks and the works progress.
- 11.1.8 A competent/licensed contractor will survey (pre-site preparation survey as defined by the HSE) and remove any asbestos containing material and other materials and structures contaminated with asbestos fibres, if found on Site.
- 11.1.9 A MMP will be developed in accordance CL:AIRE Definition of Waste Code of Practice for earthworks, cut, fill and any proposed materials re-use within the site area. The MMP must be independently reviewed and approved by a Qualified Person under that scheme. The MMP can include materials segregation, recycling and disposal etc. Note that any materials recovery may need appropriate waste recovery permits. This is to be determined by the contractor.
- 11.1.10 Ground gas risks and protection measures are appraised in accordance with British Standard 8485:2015 (+A1.2019) and BS8576 '*Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings.*' Basic ground gas protection has been recommended to meet CS2 (low risk) sites; this will comprise well reinforced monolithic ground bearing slab with minimal penetrations and a ground gas membrane beneath sensitive ground floor spaces.
- 11.1.11 Gas membrane installations shall be installed by NVQ Level 2 qualified installer and independently inspected and validated.
- 11.1.12 A Discovery Strategy will be provided for the Site. The Discovery Strategy will aim to detect and manage previously unidentified finds of suspected contamination that may be encountered during groundworks. The strategy will comprise Stop – investigate – report – remediate if necessary – validate. Any finds reported under the discovery strategy to be reported as part of a verification report to be produced prior to practical completion.
- 11.1.13 The management of infiltration and promotion of leaching to groundwater will be undertaken. Furthermore, measures will be in place to minimise infiltration to groundwater, as followed:
- Any stockpiled material is to be covered and placed on an impermeable surface;
 - Remove / treat any gross contamination if identified in line with the project Discovery Strategy; and
 - Groundwater is to be managed during excavation works. Abstraction and subsequent discharges should be undertaken in accordance with relevant permitting requirements and pre-treatment may be required to comply with discharge consents. Treatment may require removal of suspended solids, free and/or dissolved phase contamination. No unauthorised discharge permitted to sewer or surface waters.

12 Ecology

12.1 Risk assessment of potentially harmful construction activities

12.1.1 The proposed development will require the removal of the majority of habitats currently present to facilitate the construction of three new larger industrial units. Vegetation clearances and building works are the main activities that may cause harm to wildlife in the absence of appropriate controls. Any inappropriate use of lighting during construction may also impact bats, badgers, otters, and other nocturnal wildlife present.

12.1.2 A summary of ecological constraints present within the site have been outlined in detail below.

- **Designated sites:** Sections of the Wey Navigation and the Woburn Park Stream Sites of Nature Conservation Importance (SNCI) must be protected from development and potential pollution;
- **Habitats:** The existing woodland and hedgerows should be retained within proposals, protected during construction;
- **Plants:** Small-leaved cotoneaster, a species which is listed on Schedule 9 of the Wildlife and Countryside Act (1989 as amended), should be removed and disposed of as controlled waste to insure it does not spread; Jersey cudweed, a species protected under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), has been identified within the northern portion of the Site. Consultation with Natural England is required to confirm necessary mitigation measures to be employed;
- **Amphibians:** Precautionary clearances measures are required to protect this species group during work;
- **Reptiles:** Precautionary clearances measures are required to protect this species group during work;
- **Nesting birds:** Vegetation clearance to be undertaken outside of bird breeding season (September – February inclusive) or preceded by a nesting bird check from a suitably qualified ecologist if undertaken within the season;
- **Nocturnal animals:** A sensitive lighting scheme is recommended to minimise the impacts on nocturnal activity during construction;
- **Badger:** Precautionary measures to reduce potential impacts; and
- **Hedgehog:** Precautionary measures to reduce potential impacts.

12.1.3 These constraints will be addressed through the implementation of precautionary working measures to minimise the risk of any harmful construction activities accordingly.

12.2 Habitats

12.2.1 As works will be taking place in close proximity to sections of the Wey Navigation SNCI and the Woburn Park Stream SNCI, the following safe working methods should be adhered to at all times to avoid pollution of these watercourses. A map outlining the location of these features has been provided below.

- Any activities involving potential pollutants, such as concrete or fuel, should be carried out in dedicated areas which are designed so that spills, leaks, drips and contaminated run-off can be captured and properly disposed of.

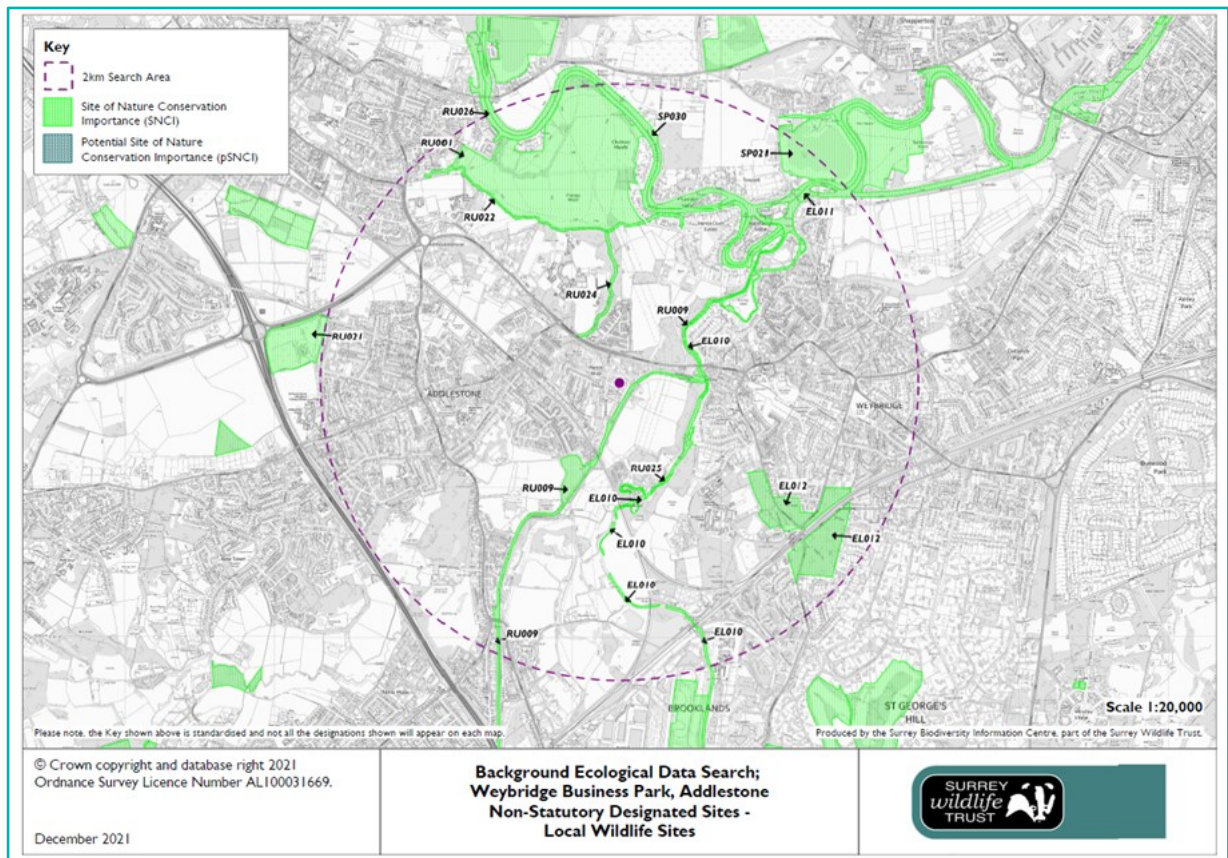
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- Stockpiles (for example soil, sand or hardcore) should be protected so that materials are not blown or washed away. They should be stored at least 10m from the banks of the watercourses.
- Water should be prevented from entering any excavations via the use of cut-off ditches or covering the excavation. Any water pumped out of excavations should not be pumped into the watercourse.
- Works should be carried out as far from the banks of the watercourses as possible to avoid stirring up silt or dropping pollutants into the water.

12.2.2 Further information can be found in the guidance by CIRIA for working next to water (Masters-Williams *et al.*, 2001) and from the Environment Agency (Environment Agency, 2019).

Figure 12.1: Location of SNCIs - Wey Navigation SNCI (RU009) and the Woburn Park Stream SNCI (RU024)



12.2.3 All woodland, hedgerows and trees that are to be retained will be protected by Heras fencing during construction to avoid damage or accidental removal. This should be put in place before works commence. This should be installed around tree pits and at the edge of the areas of the existing hardstanding boundary with the woodland and trees.

12.3 Plants

12.3.1 Small-leaved cotoneaster, a species which is listed on Schedule 9 of the Wildlife and Countryside Act (1989 as amended), should be removed and disposed of as controlled waste to insure it does not spread. Control of cotoneaster species includes mechanical and chemical measures, as set out below:

- **Mechanical methods of control:** Pulling young seedlings and excavating the root mass. Any material from the cotoneaster/containing cotoneaster waste must be chipped/burnt on site, or removed to licensed landfill as controlled waste. We advise that a monitoring programme is put in place on the subject site to check if berries have been dispersed creating new infestations which can then be treated.
- **Chemical methods of control:** Spraying plants with herbicide and treating stumps of larger plants to prevent regrowth. Herbicide treatment is made up of two treatments taking place in the Summer (June-August), the chemical is mixed with an adjuvant to increase its effectiveness controlling the visible plants within the year. Follow up monitoring visits will need to take place in subsequent years to treat any seeds which germinate post the initial treatments.

12.3.2 Instances of Jersey cudweed were identified within the northern Site parcel. This species is protected under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) such that it is an offence to intentionally pick, uproot or destroy this plant. As renovation of the car park will be undertaken, a licence will need to be obtained from Natural England to take Schedule 8 plants (such as Jersey cudweed) for conservation purposes. An appropriate mitigation strategy will need to be agreed with Natural England as part of this licence, which will most likely involve clearing the cudweed colonising the Site in late summer (July-September) and collecting the seed bank. An appropriate receptor site will then be required to sow the seed, which would ideally be located within the Site.

12.3.3 Further details of this will be provided once a licence has been granted and a mitigation strategy has been developed.

12.4 Amphibians and reptiles

12.4.1 The woodland, scrub and grassland within the northern parcel of the Site provide opportunities for terrestrial amphibians and reptiles, whilst the log piles within the woodland also provide suitable hibernation opportunities. A sensitive vegetation clearance exercise will be adopted to avoid harming any amphibians or reptiles present during the clearance works. This will be achieved through the employment of habitat manipulation where vegetation is cleared in a staged and directional manner towards retained contiguous habitats, thereby encouraging herpetofauna to relocate to retained peripheral habitats. Initially vegetation should be cut to approximately 15cm in height and followed by a search of the area for animals. Following this, the vegetation can be cleared to ground level. This should be conducted outside of the hibernation period (between March/April and September/October) and should be carried out under the supervision of an experienced ecologist.

12.4.2 As a precautionary measure, it is also recommended that destructive search is undertaken where refuge features, including the log piles, will be carefully searched using hand tools, under the direction of the supervising Ecological Clerk of Works (ECoW). Should any amphibians or reptiles be found during the habitat clearance they will be moved to suitable retained habitat. It is important to note that if a great crested newt *Triturus cristatus* is found during the destructive search, then work must stop and a licence should be sought from Natural England, which can result in delays to works.

12.5 Nesting birds

12.5.1 All wild birds, their active nests and eggs are protected under the Wildlife and Countryside Act (1981), as amended. This makes it an offence to deliberately, or recklessly kill or injure any wild bird or damage or destroy any active nest or eggs of a wild bird. Some bird species are listed under Schedule 1 of the

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Wildlife and Countryside Act (1981) as amended and it is an offence to wilfully or recklessly disturb an active nest site of these species or disturb adults when they are with dependant young.

- 12.5.2 Vegetation clearance and building demolition of any suitable nesting habitat on site (primarily the scrub to the east of the Site) is scheduled to take place outside of the bird breeding season in order to avoid impacts on nesting birds.
- 12.5.3 If any vegetation clearance and demolition works are required during the breeding bird season (between the months of March and August inclusive), such works can only proceed following the completion of a nesting bird check undertaken by an experienced ornithologist. Any active birds' nest identified during this check must be protected from harm until the nesting attempt is complete. This will require a buffer to be left around the nest, the size of which will depend upon the species involved (as a general rule, this will be 10m of vegetation in all directions around the nest). Any vegetation buffers established as a result of the initial nesting bird check must be subjected to a second check after the original nesting attempt is completed before such areas can be removed during the breeding bird season (between the months of March and August inclusive).

12.6 Nocturnal animals

- 12.6.1 Lighting is known to adversely affect bat foraging behaviour, along with negatively affecting other wildlife including otter, birds, badger and hedgehogs; all of which have the potential to use the Site.
- 12.6.2 Construction lighting should be avoided in the first instance. However, the lighting design during construction works, if required at all, will be developed in line with the following principles:
- Minimise the lighting levels across the Site;
 - Minimise upward spill of light with the use of directional luminaires, shields, baffles and louvers to direct light where it is needed and prevent light being directed over and around the feature concerned;
 - There must be no light spill onto surrounding trees, woodland, River Wey and Woburn Park Stream SNCI; and
 - Consider the timings of lighting required, where possible avoiding lighting in the hours immediately after dusk and before dawn when bats are most active.
- 12.6.3 Further information is available from the Bat Conservation Trust (BCT 2018, 2019).

12.7 Mammals

- 12.7.1 The Site is considered likely to provide suitable habitat for hedgehog and other small mammals. In order to safeguard mammals should they enter the site during construction works, the following measures will be implemented:
- Backfilling or providing a ramp in excavations before dusk to avoid animals becoming trapped in them;
 - Maintaining access across the construction site for badgers by not blocking or storing equipment along possible commuting routes;
 - Avoid construction lights illuminating commuting routes (e.g. woodland edges and northern boundary of the northern site) during construction;

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- Site contractors are made aware, during inductions, of the potential presence of badgers onsite and the need to stop works and contact MKA Ecology if a badger is found during construction works; and
- Any chemicals or potentially harmful compounds to be stored within badger proof containers.
- The storage of topsoil or other building materials will be given careful consideration. Mounds of topsoil will be kept to a minimum to prevent mammals such as badger utilising them for sett building.
- Stacks of pallets and other building materials may offer resting places and should be inspected daily prior to works commencing.
- Unsecured food, litter or chemicals will not be left within the working area overnight.

12.8 Ecological Clerk of Works (ECoW)

ECoW role and responsibility

12.8.1 The nature and complexity of the ECoW role varies considerably between sites but often involves:

- Supervising the implementation of best practice guidance through the construction and operational phases of developments.
- Ensuring that works on site comply with legislation regarding protected species. Non-compliance with environmental and ecological legislation, licences or consents can result in delays to a project, heavy fines and even custodial sentences in some circumstances. The role of the ECoW can add significant value to a project, not just by avoiding fines and delays, but through enhancing the reputation of clients and their projects through good publicity.
- Providing guidance and advice on how to avoid or minimise on-site ecological impacts through, for example, the design and supervision of ecological mitigation and compensation measures.
- Checks to ensure that ecological enhancement measures installed within the site are appropriately situated and functional.

12.8.2 Before any work can proceed on site, the ECoW must ensure that any ecological issues have been identified and that adequate protection measures are put into place. These have been outlined within this document. The primary roles for the ECoW at will be undertaking a pre-commencement supervising vegetation removal and destructive searches and undertaking nesting bird checks, if required.

Onsite induction

12.8.3 The ECoW will provide a brief induction for contractors on site prior to commencement of works, detailing the contents of this document. A copy of the CEMP should be available onsite at all times.

12.8.4 Any new contractors starting at the Site will be made familiar with the contents of this document before starting any works at the Site. Ideally the key messages in this CEMP should be included in the general site induction for new contractors.

Communication

12.8.5 Good communication and close liaison with other contractors, project managers and designers are an essential part of this type of work. The ECoW should not 'police' the site or give instruction but must ensure that sensitive ecological issues are identified early and managed according to Best Practice. During site operations that may impact upon the ecology of the site, the ECoW will work closely with site

Weybridge Business Park, Weybridge

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operatives and operators of machinery to provide advice and be at hand in case any issues arise during works.

- 12.8.6 The ECoW and site manager should agree a procedure of work before any works commence with regard to avoiding harm, damage or destruction to any species and habitats protected by law and/or relevant planning guidance.
- 12.8.7 Agreements should be put into document form and all site operatives should be briefed and sign the document to confirm that they agree to adhere to the procedures and methodologies outlined. An example of a written formal agreement would be a CEMP such as this, outlining the methods and constraints that site operatives must adhere to so that the work on site complies with planning conditions, licenses and best practice guidance.

[Close-down report](#)

- 12.8.8 A brief Letter Report summarising the outcome of the clerk of work actions will be issued. This will include confirmation of legislative compliance and best practice through the construction and operational phases of developments, in addition to an assessment of the ecological enhancement measures installed within the site.

12.9 Construction Phase Management Timings

- 12.9.1 An indication of the timings for the construction phase management actions to be undertaken is shown in [Table A1](#) of [Appendix A](#). These should be used to inform the scheduling of development works at the site.

13 Hydrology & Water

- 13.1.1 Implementation of an appropriate temporary drainage system will be required in order to minimise the potential risk of increased sediment affecting the surrounding areas during construction activities on-Site. This will be detailed in the Site-Specific CEMP, once the Principal Contractor has been appointed.
- 13.1.2 The following general mitigation measures will be implemented to protect the water environment and surface water quality during all construction activities:
- The exact locations of nearby sewers and water supply infrastructure will be established by on-Site survey prior to demolition works. An appropriate protection system (i.e. temporary support structure, sheet piles, installation of secant piles etc.) will be implemented to minimise any impact to the public sewer network.
 - Silty water abstracted during excavations will be discharged to settlement tanks. Cleaned run-off will be discharged through the existing foul sewer drains. If sewer capacity is limited, then silty water will be stored and removed from the Site by tanker and disposed of at a suitably licensed location. A discharge consent detailing volumes and rates of discharge will be agreed with Thames Water Utility's Limited prior to the commencement of works, if necessary;
 - The Principal Contractor will take precautions during works to protect the entire drainage system from siltation or pollution;
 - Use of flocculants, clarifiers and plate separators for the treatment of suspended solids; and
 - Minimise the risk of ground contamination all plant operators will be required to clean up any small fuel or oil spillage immediately.
- 13.1.3 In the event of a significant fuel or hydrocarbon spillage the following actions will be implemented:
- The incident will be reported immediately to the Environmental Manager/Representative;
 - The Environmental Manager will then implement measures to initially prevent the spread of the spillage, particularly to any drainage point and then implement measures to clear the spillage;
 - All collected waste materials will then be placed into the appropriate waste receptacles such as oil drums for disposal off-site as hazardous waste;
 - All such incidents will be recorded in the on-Site Incident Log, a copy of which will be forwarded to the Project Team;
 - In the event of a significant environmental incident occurring the Environment Agency and RBC will be advised immediately; and
 - Spill response training drills and responsible persons as good practice;

14 Lighting

- 14.1.1 Demolition and construction works are not expected to take place during periods of darkness. However, during the demolition and construction works, events may occur where lighting may be required for short periods of time. Lighting is essential for health and safety, and adequate lighting, whether this is natural or artificial, should be in place for the duration of the construction works to reduce the risk of accident and injury.
- 14.1.2 In line with the Construction Design and Management Regulations (2015), the following should be implemented:
- Each construction site and approach and traffic route to that site must be provided with suitable and sufficient lighting, which must be, so far as is reasonably practicable, by natural light.
 - The colour of any artificial lighting provided must not adversely affect or change the perception of any sign or signal provided for the purposes of health or safety.
 - Suitable and sufficient secondary lighting must be provided in any place where there would be a risk to the health or safety of a person in the event of the failure of primary artificial lighting
- 14.1.3 Where temporary lighting is required, there will be no upward lighting, will be directed away from sensitive locations such as residential and ecological areas and will be switched off when it is not required for safety or security reasons.
- 14.1.4 Some vehicle mounted lighting may be required in poor weather / poor visibility to enable clear sight, safety of workers is paramount, and this shall be considered by Site Management teams.

15 Archaeology

- 15.1.1 Any construction works involving ground disturbance will pay due attention to the potential presence of unknown and recorded archaeological subsurface features or structures.
- 15.1.2 It is not considered that the potential below ground archaeological remains would prevent the proposed development. Should it be deemed necessary, a programme of archaeological mitigation works would be agreed with RBCs archaeological advisor.
- 15.1.3 Any further archaeological works would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and all archaeological fieldwork would be monitored by the LPA's archaeological advisor to ensure that the works comply with the agreed WSI. Further details regarding any fieldwork methodology would be set out in the WSI.

16 Unexploded Ordnance (UXO)

16.1.1 An UXO Risk Assessment³ has been undertaken for the Site. The following mitigation measures are recommended to support the works, based upon the findings of this Assessment.

Table 16.1: Recommended Mitigation Measures

Type of Work	Measure
All Works	<p><u>UXO Risk Management Plan</u></p> <p>It is recommended that a site-specific plan for the management of UXO risk be written for this site. This plan should be kept on site and be referred to in the event that a suspect item of UXO is encountered at any stage of the project. It should detail the steps to be taken in the event of such a discovery, considering elements such as communication, raising the alarm, nominated responsible persons etc.</p> <p><u>Site Specific UXO Awareness Briefings to All Personnel Conducting Intrusive Works</u></p> <p>As a minimum precaution, all personnel working on the site should be briefed on the basic identification of UXO and what to do in the event of encountering a suspect item. This should in the first instance be undertaken by a UXO Specialist. Posters and information on the risk of UXO can be held in the site office for reference.</p>
Shallow Intrusive Works / Open Excavations Northern Site	<p><u>Unexploded Ordnance (UXO) Specialist Presence on Site to support shallow intrusive works</u></p> <p>When on site the role of the UXO Specialist would include:</p> <ul style="list-style-type: none"> Monitoring works using visual recognition and instrumentation, including immediate response to reports of suspicious objects or suspected items of ordnance that have been recovered by the ground workers on site. Providing UXO awareness briefings to any uninformed staff and advise staff of the need to modify working practices to take account of the ordnance risk. To aid incident management which would involve liaison with the local authorities and police should ordnance be identified and present an explosive hazard.
Borehole/Piles Northern Site	<p><u>Intrusive Magnetometer Survey of all borehole and pile locations down to a maximum bomb penetration depth:</u></p> <p>Deploy a range of intrusive magnetometer techniques to clear pile locations. The appropriate technique is influenced by a number of factors, but most importantly the site’s ground conditions. The appropriate survey methodology would be confirmed once the enabling works have been completed.</p>

³ 1st Line Defence, 2021. *Detailed Unexploded Ordnance Risk Assessment – Weybridge, Addlestone Rd.*

17 Monitoring & Review

17.1 Environmental Monitoring Programme

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

17.2 Inspections

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

17.3 Event Based Inspections

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

17.4 Reporting

Monthly Reporting

17.4.1 A monthly environmental monitoring report should be prepared and submitted for review to the Applicant and Project Team. The report shall include a summary of environmental issues and actions during the period to ensure compliance with the CEMP, including details of any action item requests, complaints received, incidents, associated investigations and corrective actions, and environmental inductions and awareness training provided during the period.

17.5 Performance

Progress Meetings

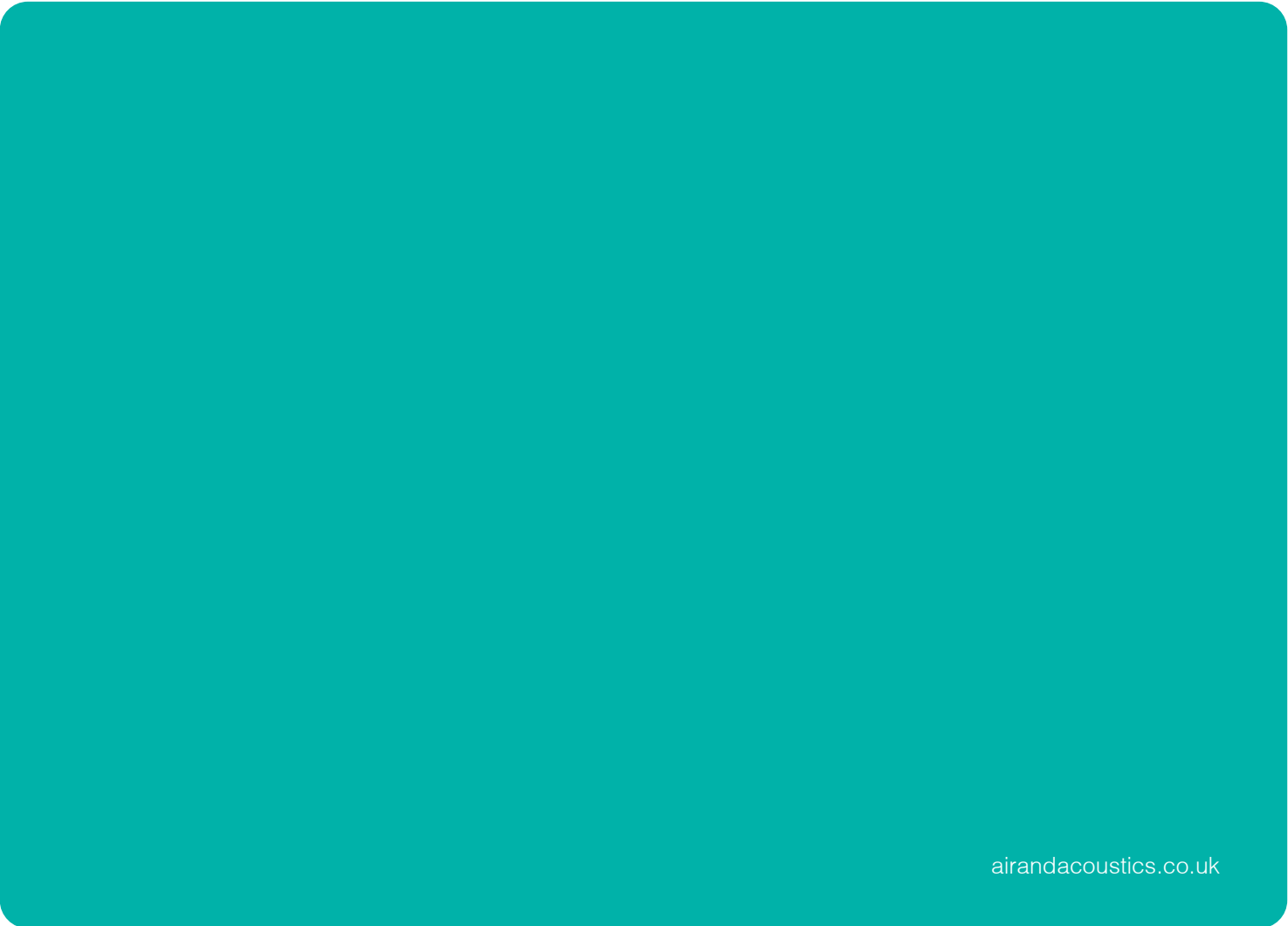
17.5.1 Performance against the objectives and targets outlined in the CEMP should be reviewed at regular progress meetings. Progress meetings can include internal Principal Contractor meetings and Project Team meetings with the Applicant and Applicant representatives. Performance against 'rolling' targets can be reviewed and corrective actions agreed, as required. These actions should be monitored to demonstrate continuous review and improvement.

- Responsibility: Project Manager/Principal Designer
- Action: Environmental issues to be added to the agenda of all internal progress meetings and external progress meetings (Applicant /Principal Contractor/Principal Designer).

17.6 CEMP Review

- 17.6.1 The Applicant, Principal Designer and Principal Contractor will ensure that controls outlined in the CEMP are properly implemented and regularly monitored to ensure their effectiveness. Changes to the controls will be instigated if they are not achieving their objectives. The CEMP shall be revised and refined where required, to ensure it remains consistent and up to date with environmental regulatory requirements and the conditions of planning approval.

APPENDICES



APPENDIX A – CONSTRUCTION PHASE MANAGEMENT TIMINGS

Table A1: Construction Phase Management Timings

Role	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Cotoneaster removal (chemical treatment)						█	█	█				
Jersey cudweed clearance and seed bank collection							█	█	█			
Vegetation clearance (outside of breeding bird season)	█	█							█	█	█	█
Vegetation clearance requiring nesting bird check (during breeding bird season)			█	█	█	█	█	█	█			
Vegetation clearance and destructive search (outside of herpetofauna hibernation period)			█	█	█	█	█	█	█	█		

Key	
Optimal timings of works	█



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