

Morris Russell Planning

Application Ref 20240611

Garages Rear Of 2 - 28 Campbell Road, Gravesend, Kent

Code of Construction Practice / Construction Management Plan

Ref 1056

Date: July 2026

1.0 Introduction

- 1.1 The aim of this document is to provide details of the construction methodology for development at land to the rear of 2 - 28 Campbell Road, Gravesend, Kent.
- 1.2 The site is located on a parcel of land set back from Campbell Road. The development consented under application Ref 20240611 is for 5 no new homes with landscaping, access, parking, refuse, recycling and cycle storage.
- 1.3 Condition 3 of Planning Permission Ref 20240611 requires the following:

No works shall commence on site until a comprehensive Code of Construction Practice/Construction Management Plan covering all environmental impacts of this development has been submitted to and approved in writing by the Local Planning Authority.

The Code of Construction Practice/Construction Management Plan shall include details, where relevant, of the following, including any other measures deemed reasonably necessary

(a) Suitable mitigation measures to minimise noise pollution and vibration during the construction phase including the insulation of fixed plant and the silencing of vehicles and mobile machinery

(b) A Dust Management Plan to minimise emissions to air and to prevent nuisance from wind-blown dust including fencing and the dampening down with water of excavated construction and cover materials on site, and other areas traversed by plant vehicles and machinery

(c) A Construction Traffic Management Plan covering:

- Details of numbers and routeing of construction and delivery vehicles to / from site*
- Timing of deliveries*
- Parking and turning areas for construction and delivery vehicles and site personnel*
- Type and location of wheel washing and chassis cleaning facilities*
- Temporary traffic management / signage*

(d) Details of the location of the proposed construction compound

(e) Details of security fencing and other site security measures

(f) Details of stockpile areas for building materials or for fill or removed topsoil

(g) A Construction Drainage Design Plan to identify the required devices to prevent construction run off from flowing into existing drainage

(h) Ecological mitigation measures

(i) Measures to be undertaken to protect any public sewers and water apparatus

(j) Details of vibration monitoring and mitigation during any necessary piling works

(k) Details of the location, form and visual appearance of any site hoardings along road frontages and footpaths

(l) Details of temporary construction or security lighting; and

(m) Monitoring and review provisions with the Local Planning Authority.

The construction of the development shall adhere at all times and be carried out in full accordance with the relevant approved document or any subsequent variations that may be approved in writing by the Local Planning Authority.

Reason: To ensure that construction of the development does not result in avoidable congestion on the local highway network, and to protect the amenity of local residents and businesses and protected species and to mitigate the risks to groundwater, in accordance with adopted Gravesham Local Plan Core Strategy Policies CS11 (Transport), CS12 (Green Infrastructure) and CS19 (Development and Design Principles)

1.4 These matters will be addressed throughout the body of this report.

2.0 Pre-construction Phase

- 2.1 During the preconstruction phase, all surveys required will be carried out to identify and reduce the risks associated with the project. The findings of these surveys will enable the accurate planning and management of the works as well as completing them safely. During this stage of the project, the experienced Operational Team will assist the design process by sharing their expertise by attending the Design Team Meetings and reviewing all proposed construction information to ensure the project can be constructed and maintained without any major health & safety challenges or implications. Prior to site construction commencement, a pre-start record of site conditions on the adjoining public highway will be undertaken.

3.0 Existing Services

- 3.1 The status of live services will be established prior to commencement of the works, with any identified services being disconnected/diverted ahead of breaking ground.
- 3.2 There are no existing services confirmed on site.

4.0 Ground Conditions

- 4.1 The site footprint was a concrete hardstanding with garages above. However this has largely been broken up and the garages have been demolished. There are no any concerns or challenging ground conditions identified..

5.0 Noise and vibration pollution and monitoring

- 5.1 All works will be in compliance with the Control of vibration Act 2005, HAVS monitoring will be considered following subcontractor appointments / appropriate plant selection. The trade specific RAMS will be developed and approved accordingly. The foundation solution is a strip footing with reinforced mesh, therefore no piling works. Specific control measures to any further specialist equipment will be assessed once known. Managing (avoiding) neighbour issues with vibration during the construction works, caused by site plant and vehicles will be carefully planned, monitored, and

assessed by site management. Site vehicle routes on site will also be monitored. Any (unavoidable) activities that cause higher levels of vibration will be communicated and if necessary, carried out at appropriate times during the day with breaks.

- 5.2 Throughout the construction phase, good working practices will be adopted to manage and reduce any associated impacts upon the local community.
- 5.3 The nature of the work involves some noisy activity but unlikely to a degree where daily exposure is exceeded. However, ear defenders will be made available to staff and will be worn where required.
- 5.4 Similarly, the mount of activities involving vibrating tools is limited but will be monitored to ensure rotation. Staff will be trained in the risks associated with vibrating tools.
- 5.5 The Site Manager will monitor noise levels and where necessary each operative will be informed that the correct ear defenders with the right SNR rating must be worn.
- 5.6 Every effort will be made to keep noise levels low. Where it is anticipated that noise levels will rise, the Siter Manger will be informed and work will not commence until permission is granted.
- 5.7 Where alterations to the work programme are made to accommodate the reduction of noisy operations, the Site Mnager will inform the CDM Principal Designer / Contract Administrator / Client.
- 5.8 All materials, plant and equipment will be handled carefully to help reduce noise levels. This will be instructed to all operatives before commencing on site as part of their site induction.
- 5.9 All tools will be properly maintained an services to ensure that noise levels created are kept to a minimal level and whenever possible, will be fitted with baffles or silencers.
- 5.10 Wherever practicable, all plant and equipment will be powered my mains electricity in preference to locally powered sources such as diesel generators.
- 5.11 No radios will be permitted outside of buildings. Where used within a building, the Site Manager will ensure noise pollution outside of the building is kept to a minimum so as not to disturb neighbours.

- 5.12 No work activities which create high noise levels will be undertaken before 08.00 or after 17.00. Noisy work activities will not be allowed at any time during the weekend or bank holidays – with these hours of operation strictly controlled by planning condition regardless.
- 5.13 The control of noise, dust and fumes will be an important aspect on this contract due to the proximity of residents. It will be identified how these nuisances are controlled. In the main, standard procedures will be employed.
- 5.14 There are three main types of plant that will generate an impact:
- Fixed plant - Site generator unit and concrete agitator drum
 - Mobile plant - Hydraulic breaker attachments, rotary piling rig, excavators, rollers, compaction plates, dumpers, concrete pumps, compressors, concrete agitator drums (truck mounted) and pressure washers
 - Handheld plant - Pokers, drills, nail guns, cut off saws, circular saws, tec guns, screw guns, impact drivers, reciprocating saws, angle grinders, routers, planers, and CP9 breakers.
- 5.15 All plant will be supplied with written data for the noise level produced when in operation. All plant will be inspected and registered on a weekly basis to ensure that it is in good condition, serviceable and is maintained and in a safe condition. Where possible, material will be factory cut or factory assembled to minimise the need for plant on site. All NRMM of net power between 37kW and 560kW operating on site will meet the standards based upon the engine emissions standards in EU Directive 97/68/EC and its subsequent amendments.
- 5.16 Standards set out in the GLA policy will be met. The current standards are engines will need to meet stage V if they are in the Central Activities Zone and Opportunity Areas.
- 5.17 This project will be registered on the London NRMM Register.
- 5.18 Fixed plant will be enclosed or where required will have acoustic screens placed around them to minimise noise pollution. All fixed plant engines will incorporate vibration mounts. The other possible source of noise will be vehicular movements for deliveries to the project. This will be kept to a minimum

by switching off engines whilst vehicles are being unloaded, having scheduled deliveries one at a time and inside site working hours. All plant will be in good serviceable condition which will be checked regularly and registered accordingly by the site management team. Where possible or practicable, electrically powered plant will be used as this is generally quieter when operated. Wherever practical, noisy activities will be carried out in screened areas within the site or building and not on the boundaries. All staff and subcontractors will be made aware of noise issues through inductions and specific toolbox talks.

- 5.19 The site management team will monitor and record the noise levels at set points along the site boundaries. These records will be kept on site and if necessary, additional noise level monitoring will be carried out during construction activities if using plant that creates a higher level of noise. The management team will use handheld Sound level meters to carry out the above monitoring. Exact details and locations to be monitored are to be established on site and set out on the monitoring plan, but it is envisaged that it will be carried out on a weekly basis at locations near to the existing occupied dwellings. When using noisy equipment, this monitoring is to be increased to daily monitoring. All records to be available for inspection on site.
- 5.20 It is anticipated that we will not exceed a constant noise level in excess of 75 dB at any of the site boundaries. However, works may dictate that noise levels may be increased for short periods only. Wherever practical and reasonable, noise levels at the site boundary will be kept to a minimum.
- 5.21 Mechanical equipment and plant will be positioned taking due consideration with regard to preventing the transfer of fumes to existing premises.
- 5.22 Dust arising from the building process will be controlled in accordance with standard procedures - above. This is primarily achieved through dust suppression/collection facilities provided to equipment and plant.

6.0 Control of Dust

- 6.1 The standard dust management plan is attached at Appendix 1.

- 6.2 Noise and dust on projects are kept to a minimum for the well-being and comfort of site operatives, visitors, neighbours and general public. Wherever possible the source of noise or dust is removed by using off site manufacturing or alternative construction methods. Where the source of noise, dust or fumes cannot be removed completely then it must be controlled and reduced to an acceptable level with the use of suppression measures.
- 6.3 Measures including regular clean ups, wetting down, using ready mixed concrete, motor etc to control the amount of dust created will be utilised on site.
- 6.4 Local dust extraction equipment will be fitted to grinding machinery and masonry. Silica based materials will be cut using water suppression and wet cut methods. Plant and hand tools will be fully maintained within approved dust suppressors-reservoirs / silencers / acoustic pad sleeves around it.
- 6.5 Equipment will be switched off when not in use.
- 6.6 Dust masks will be available and the site manager will ensure that they are worn during dust creating activities.
- 6.7 Visual monitoring will be carried out at sensitive locations.
- 6.8 The potential for dust to arise during construction is highly weather dependant. If carried out during dry weather, increased water spraying will be required. In wet weather greater attention will be paid to vehicle cleaning - see below.
- 6.9 No bonfires will be permitted on the site.
- 6.10 The contractor will ensure that dust sheets are correctly fitted over loaded skips.
- 7.0 Wheel washing and chassis cleaning facilities**
- 7.1 In inclement weather, there will be regular cleaning of site vehicles, operatives boots, lorries and vehicles leaving the site (including wheels).

- 7.2 During the construction phase the permanent new access roads will be installed to sub base tarmac level, so it is anticipated that any need for wheel washing will be minimal.
- 7.3 Wheel washing facilities will be provided for in the form of a Jet washer wheel wash. The jet washer system includes a gully set in the new road that is connected to a sump which gathers the sediment. Sedimentation deposited within the tank will be removed from site by a licenced waste carrier.
- 7.4 All dirty wheels will be complete cleaned before leaving the site. This will be monitored and recorded. Should a vehicle discharge any mud or dirt on the road, a road sweeper will be on standby to clean it up.
- 7.5 As a precaution any nearby SW gullies will be fitted with filtering layers that will be checked and cleaned as required. The most appropriate action to avoid the need for wheel washing will be to ensure all haul roads are installed and cleanliness maintained from the outset.

8.0 Construction Traffic Management / Construction and delivery vehicles

- 8.1 Details of the HGV routing plan are provided on Plan 2. This shows that vehicles arriving from Old Road West will turn right into Campbell Road. On leaving the site, vehicles will take the same route.
- 8.2 Materials coming to site will include groundwork materials, steel, concrete, bricks/mortar & stonework, timber joists & trusses, windows/doors, mechanical plant/sanitaryware, electrical goods, metal frame/plasterboard, internal doors/skirting/architraves, kitchens and paints.
- 8.3 During Ground works and Civils' deliveries will primarily be with low-loaders for deliveries of plant, grab lorries for muck away and concrete lorries for the pouring of concrete. Only one large vehicle will be permitted on site at a time.
- 8.4 As often as possible the vehicles entering site will be a transit style vehicle used by various tradesmen. The vehicles will pull up and park in the site compound Unload/Load and leave site to the designated parking areas.

8.5 A 7.5t flatbed lorry or similar will be used for the delivery of scaffolding and other bulk deliveries.

8.6 It is anticipated that there will be deliveries of 3 per day during the initial ground works over a maximum of 3 weeks but this will then reduce to a maximum of 3 per week.

9.0 Timing of deliveries

9.1 Deliveries shall only take place between 10.00-14.00 and 16.00-17.00 Monday to Friday and to the Cambell Road entrance. All deliveries will be delivered pre-arranged on a just in time basis avoiding the busiest rush hour periods and school drop off and pick up times when ever practicable.

9.2 The operators of all equipment and plant shall have the appropriate training and experience and records of their certificates, licences or training will be available for inspection upon request.

9.3 The designated unloading areas are shown on Plan 1. Under no circumstances will any vehicle be permitted to offload off site, either in the entrance or on the roadside.

10.0 Parking and turning areas for construction and delivery vehicles and site personnel

10.1 Parking and turning areas for all users of the site will be located within the boundary of the site and are identified on Plan 1.

10.2 There will be a 'no on-street parking' condition enforced on all workers and visitors to the site.

10.3 At all times, large vehicles will be on a timed arrival and a gate keeper will be present to meet vehicles and ensure the gate is open in advance so that they are banked onto the site without delay and avoid congestion on the highway.

11.0 Temporary traffic management / signage

- 11.1 Owing to the contained nature of the site as shown below, with only a single access to the highway and with the main body of the site set back from the highway, there will be no need to temporary traffic management arrangements.
- 11.2 External traffic signage will be positioned clearly at the site entrance and within the main office/canteen to direct vehicles and pedestrians to designated areas. Signage will enforce a speed limit of for vehicles entering or exiting the site.



- 11.3 Vehicles must reverse in and drive out in forward gear.
- 11.4 As detailed above, site personnel will park on site with the access gate being open to allow immediate ingress and no impact on Campbell Road. Deliveries will be time and a gate keeper will be present to meet vehicles and ensure the gate is open in advance so that they are banked onto the site without delay and avoid congestion on the highway.

- 11.5 Once unloaded the banksperson will take the vehicle out of the site. The deliveries will be coordinated so as not to clash with one another removing the possibility of any deliveries being held on the public highway.
- 11.6 Signage is to be erected prior to work commencing on site. Warning signs required and directional signs for deliveries and users of the site. Signage will be installed on the access gate to provide contractor and site manger contact details.

12.0 Proposed construction compound and storage areas

- 12.1 Large construction tools will be stored in locked containers situated within the storage area on site and small power tools will be taken off site by staff during non working hours.
- 12.2 Materials, plant and tools will only be stored in the designated storage area identified on Plan 1. Storage on top of containers will not be permitted. Standing on top of containers will not be permitted unless there are suitable handrails and means of access.
- 12.3 If it is necessary to store LPG on site, a lockable cage or cages will be provided and used. The cages will be situated in a safe position in the open air away from surface drains and at least 1m away from the compound boundary and site containers. Each cage will bear a sign stating 'LPG-NO Smoking'. LPG will not be stored in any other location on the site or compound. Gas bottles will be stored upright. Only the minimum LPG required will be stored.
- 12.4 COSHH products will be stored appropriately away from drains, water courses and other sensitive receptors.
- 12.5 All materials will be stored to minimise the risk of wastage as a result of damage.
- 12.6 Consideration has been given to the manual handling operations that are likely to take place on site and storage facilities have been located to minimise the manual handling operations that have to take place. Manual handling operations which pose a significant risk of injury will be subject to risk

assessment. Wherever practicable, loads weighing over 25kgs will be moved using wheelbarrows or sack barrows or other mechanical aid. No loads will be carried up or down ladders.

13.0 Site hoardings / Security fencing and other site security measures

13.1 Given the contained nature of the site and the existing gates on the entrance, which is the only point that the site adjoins the highway, there are no road frontages or footpaths.

13.2 The internal boundaries of the site will be secured using with a combination of 2m high timber hoarding and herras security fencing. The structural stability and visual appearance of the fencing will be inspected at regular intervals and maintenance carried out as necessary.

13.3 Security measures are as follows:

- The site entrance has a secure gate to provide access.
- All access ladders will be removed when not in use and be locked in a storage container.
- The buildings will be secured at the end of the day or if a=unattended during the working day.
- Scaffolding will be alarmed during non working hours.
- If necessary, a letter drop will be made to all surrounding neighbours to monitor the site for suspicious activity during non working hours along with contact details to report this.

13.4 The site will be locked at night and monitored CCTV will be installed. If deemed necessary security guards will be employed to patrol the site after hours, during weekends and during periods of high-risk activity. During the working day the pedestrian access to site will be a controlled access gate. All operative and visitors will need to have completed the relevant site induction process.

14.0 Drainage

14.1 Details of the all fluids kept on site will be stored in a safe place, complete with spill / drip trays. Spill kits to be kept on site at all times.

- 14.2 As discussed above, the jet washer system includes a gully set in the new road that is connected to a sump which gathers the sediment. Sedimentation deposited within the tank will be removed from site by a licenced waste carrier.
- 14.3 As a precaution any nearby SW gullies will be fitted with filtering layers that will be checked and cleaned as required. It is anticipated that wheel washing and the subsequent water usage can largely be avoided by ensuring all haul roads are installed and cleanliness maintained from the outset.
- 14.4 Main drain installation will also take place during the groundworks period. This includes new foul and surface water drainage runs, and storm water. All inspection chambers and drainage runs will be set out and excavated. These will be excavated using a suitable excavator with bucket attachments. All excavated spoil will be taken to a designated spoil heap area within the site boundary for removal from site when required.
- 14.5 Once formation level for the inspection chambers has been achieved then they will be concreted. Concrete will be delivered and placed using an excavator bucket. Concrete rings and sections will be lowered into place by the excavator using leg chains, straps and lifting pins. Each section of drainage will be fully backfilled and reinstated to ground level using the excavators.
- 14.6 The drainage layout shown at Plan 4 (GA10) will be installed early in the construction phase of works to provide permanent drainage connections as early as practicable. Southern Water have considered the drainage and advised by letter dated 15.5.2026 (attached to application ref 20260242) that they are satisfied with this proposal and are happy to discharge the associated conditions. All drains will be installed with adequate drainage protection kits to prevent oil, fuel and silt from draining into the system.

15.0 Ecological mitigation measures

- 15.1 The site does not benefit from any ecological value as it consists entirely of hard surface and rubble. An existing tree on site was approved to be removed as apart of the proposal and this has taken place. However, there is some limited vegetation in the gardens that adjoin the site. These will be screened through the use of hoardings /herras fencing to prevent any impact.

- 15.2 If protected species are found on site during the works, all works will stop, and an ecologist contacted for further advice. Works shall not recommence, until further details of the protected species found and appropriate mitigation measures are submitted to and approved by the Local Planning Authority, and implemented.
- 15.3 Enhancement measures are required through condition 26 of the permission which requires ecological measures as proposed in the Design and Access Statement and the landscaping scheme to be implemented prior to the first occupation of the development and thereafter retained and maintained in perpetuity. This includes 2 bat boxes, 2 integrated bird boxes within the building walls and the implementation of log piles and hedgehog highways also located within the site. Additionally, the scheme proposals include the provision of significant planting and green areas as well as rear garden areas for the dwellings as private spaces. The details are shown on approved plan 0526/22/A/1 which is replicated at Plan 3 in this document.

16.0 Temporary lighting

- 16.1 Adequate lighting for the safety of operatives will be provided throughout the duration of works. All lighting will be low energy, anti vandal and set out in such a way to eliminate any nuisance but ensure the safe passage of pedestrians and vehicles.
- 16.2 2 floodlights will be installed on scaffolding. One facing the access point and one facing the construction area. The spotlights will incorporate a dawn to dusk and PIR movement sensor and will be located to face downwards and not shine directly towards neighbouring houses or residential gardens.
- 16.3 Task lighting specific to internal works will be a mandatory requirement placed on all subcontractors.
- 16.4 Owing to the timing of the works, there will be no requirement for construction lighting. Due to the urban nature of the site, surrounding street and residential lights, it isn't necessary to install security lighting beyond the inbuilt scaffolding alarm lights which are an ambient red colour to avoid disturbance. If it is considered that lighting is required, approval will be secured from the LPA prior to its installation.

17.0 Monitoring and review provisions

- 17.1 All issues, near misses etc. will be reported to the Site Manager. Details of which are communicated through the site induction.
- 17.2 The issues will fall into four main categories, although there will be some crossover between these categories:
- Health and Safety
 - Logistics and Road Safety
 - Environmental
 - Security
- 17.3 A log of all issues reported will be maintained by the Site Manager for inspection
- 17.4 In the event of a collision, reports will be conducted using a report form and issued to the Site Manager
- 17.5 A log of lessons learnt will be maintained and appropriate actions will be taken to ensure best practice is always used and that there is continuous improvement in processes and activities.
- 17.6 The client will be invited to attend site meetings to ensure adequate communication between all parties relating to the monitoring and review of any outstanding matters. Regular progress reports to be provided by the principal contractor to demonstrate to the client that they are complying with their duties under CDM 2015.
- 17.7 The Site Manager will carry out all their statutory obligations while also carrying out daily audits both in and around the site to ensure that standards and procedures are constantly maintained. The senior management team also visit site to carry out regular site audits which again ensure that standards and procedures are being maintained. In addition to this, external health and safety consultants carries out random site inspections monthly to externally audit and confirm that projects are not only compliant with legal requirements but are also operating to the highest level of health and safety performance.

- 17.8 Any issues that arise on site will be presented by the principal contractor within a monthly audit. Any recommendations made will be taken into account and acted on.
- 17.9 The health and safety file shall be prepared by the principal contractor and be presented in an agreed format before a practical completion certificate is issued.

Resident Liaison & Complaints Procedure

- 17.9 Building works can at times be disruptive. The communities local to development sites are respected, and reasonable steps will be taken to minimise or eliminate any disruption that our works may cause. Communication is key to successfully delivering a project. The team will seek to build relationships with the neighbours, local communities, and stakeholders. Prior to any works on site commencing we the neighbouring parties will be written with an introduction to the team and the project. The introductory newsletter will contain the following information:
- A description of the project
 - An introduction to the team including contact details for the Site Manager
 - Proposed commencement and completion dates for the works
 - Outline of works taking place on site.
 - Site working hours.
- 17.10 At this time the Site Manger will also contact the immediate neighbours to introduce themselves in person. The neighbours and the community will be kept updated of progress and any significant planned construction activities. It is important that the site management team are visible, approachable, and accessible to residents or neighbours that may have any queries or concerns.
- 17.11 The procedure for logging and recording complaints is standardised by using a proforma complaint record and a complaints log that is kept on site for auditing and tracking purposes. This file is also presented to the Considerate Constructors Scheme Inspectors. The site team will be responsible for meeting with any concerned party regarding the construction works and how it impacts on them. This provides a direct route for a resident to set out their concerns. The site team also ensure that residents

are kept aware of any particularly noisy or dusty operation in advance and will follow up any recorded complaints made to the client, head office, local authority, or any other recognised, relevant organisation.

- 17.12 In certain situations, if resident groups are particularly concerned about the proposed works, then an informal resident meetings may be held to discuss the project and any concerns that are raised. Meetings may be facilitates using Teams/Zoom.

Considerate Constructors Scheme

- 17.13 The site will be registered in the Considerate Constructors Scheme and will be audited by an independent inspector on its consideration and interface with others. Notices will be posted at the entrance of the site, giving details of the scheme and point of contact in the event of a complaint.

Noise, Dust & Fume Monitoring

- 17.14 Please see above – section 5

18.0 Health and safety

- 18.1 The contractor shall provide suitable personal protective equipment appropriate to all site operations and locations to all operatives. All construction works and visitors to the site should wear appropriate PPE to reduce the risk of injury from materials and equipment (i.e. hard hats, protective footwear and high viz jackets).
- 18.2 The contractor shall prepare and enforce site rules in relation to the wearing of PPE for their own employees , sub contractors and on site visitors.
- 18.3 Appropriate safety measures, including scaffolding to prevent accidental falls from erected structures, to be in place throughout the project. All working areas to be kept tidy to reduce trips.

- 18.4 The contractor will ensure neighbouring gardens are not exposed to falling materials. This is unlikely given the distance from working areas. However, measures including fencing and hoardings will protect adjoining neighbors and the retained boundaries.
- 18.5 Risk assessment and method statements for mechanical lifting and handling heavy items will be provided in accordance with The Manual Handling Operations Regulations. Units heavier than 20kg are to be lifted by either a two person operative team or handled mechanically.
- 18.6 The contractor shall notify all accidents, diseases and dangerous occurrences which are reportable within the meaning of 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 1995'.
- 18.7 They will carry out all their statutory obligations while also carrying out daily audit's both in and around the site to ensure that our standards and procedures are constantly maintained. Our senior management team also visit site to carry out regular site audits which again ensure that our standards and procedures are being maintained. In addition to this our external health and safety consultant carries out random site inspections.
- 18.8 The Site Managers for the project will hold a valid First Aid at Work certificate, CSCS management card and CITB SMSTS (Site Managers Safety Training Scheme certificate) as a minimum. Further training will also be provided for site management as the project requires. These training requirements include scaffold inspection, fire marshal, manual handling, mental health awareness, and temporary works co ordinator. While all works will be assessed for risks prior to commencing the below summarises the key risks associated with this project and how we intend to manage these.

Working at Height

- 18.9 Working at height will be completed from a scaffold erected within the guidance of the current version of TG20. Any non-standard scaffold features (outside of TG20) will be subject to a specialist design. Scaffolders will follow the working practises identified in TG20 and their RAMS which will include wearing a harness and using an advanced guard rail system for the purposes of erecting, adapting and dismantling scaffold. All scaffolds will be handed over for use with a formal certificate as well as being inspected weekly or after adaption, alteration, damage or severe weather conditions.

For internal trades where working at height is required that cannot be completed off of the perimeter scaffold then we will be using mobile tower scaffolds, podiums and hop-ups (600x600). This equipment will be inspected on a weekly basis or following erection/alteration, these records will be available within the weekly inspections and visible on site using scaftags.

Slips, Trips & Falls

- 18.20 The risk of slips trips and falls is reduced by ensuring a 'clean as you go' culture on site and zero tolerance to operatives not clearing up. All operatives are expected to work in a clean and considerate manner ensuring that their workplaces are left clean and cleared at the end of every working day. Dedicated pedestrian routes will be provided throughout the site that will be well maintained and will have no need for material or debris to be in them. In the event of a spill, the guidance detailed by the HSE will be followed as detailed at Appendix Two and accessed here: [Emergency response / spill control - HSE](#)

Access

- 18.21 Access around the project will be provided by designated pedestrian routes from the pedestrian entry gate to the working areas. This will ensure that all operatives are segregated from vehicular areas and are protected from areas where there is moving plant.

Temporary Works

- 18.22 All temporary works will be designed by a Temporary Works Engineer and will be managed on site by a Trained Temporary Works Coordinator who will inspect and manage any temporary works that are required.

Material Storage

- 18.23 Bulk material storage will be located within the marked storage area in a dedicated material compound. Material will be stacked and sorted accordingly to ensure that all materials are stored safely and will not get damaged thus reducing waste.

COSHH

- 18.24 All substances and materials that are hazardous to health will be stored in a proprietary lockable COSHH store with restricted and managed access. COSHH assessments will be completed for all relevant substances and will be accompanied by the material safety data sheets.

Manual Handling

- 18.25 Manual handling of materials will be reduced as much as possible by using mechanical plant for their distribution. Manual handling toolbox talks will be carried out and where possible use off site fabrication and mechanical plant to position factory assembled items at their required location.

Fire Safety

- 18.26 A fire risk assessment will be carried out a fire plan produced that will meet the requirements of the Joint Code of Practice for Fire Safety on Construction Sites. A linked fire alarm with call points and fire extinguisher points located in key locations around the site will be provided. A gas cage for any gas bottles and a lockable bunded fuel browser complete with drip tray, spill kit, and fire point for fuel storage will be provided.

Hot Works

- 18.27 Whenever possible the carrying out of hot works on site will be avoided, but if they do need to be carried out they are controlled by a hot works permit system, so each individual activity of hot works is considered, managed and controlled.

Plant & Power Tools

- 18.28 When using plant and power tools on site all our operatives be be monitored for HAVS and their employer will have produced HAVS assessments. All plant is operated by someone who is certificated or trained to do so. Areas where noisy and potentially dangerous plant are being used are segregated from other operatives and activities on site. All electrical tools are PAT tested and temporary

installations are also tested every three months. All Plant is inspected on a weekly basis and recorded in a site safety register.

Material Storage & Distribution

- 18.29 Material storage areas will be kept within the site boundary, whilst deliveries will be scheduled and programmed to avoid any traffic congestion in the locality of the site. Once materials are on site, they will be distributed with an all-terrain telescopic forklift and tower where required.

Plant

- 18.30 Mobile plant and delivery vehicles used on site will have specific conditions set upon them to ensure noise levels are kept to a minimum. For example, the speed for all plant working on site will be a maximum of 5 MPH; plant not in use will not be left idling or operated in an 'inconsiderate' manner. All noise levels will be kept to an absolute minimum as is reasonably practicable for the work activity being carried out. All plant used on site will have the designed, factory fitted, appropriate silencers and baffles to minimise noise. All plant and equipment purchased or hired should be designed and constructed to ensure that noise produced is as low as possible with suppliers being asked to provide information about noise emissions under actual working conditions. Wherever practical, secondary noise reduction measures will be employed. For example, an acoustic screen will be positioned around a generator set. Where particularly noisy operations are envisaged, interim noise surveys will be carried out as and when conditions dictate. A copy of these surveys will be kept on site. The site will be registered in accordance with the Non-Road Mobile Machinery Guidelines with a view to reducing the environmental impact by using machinery that reduces emissions. All plant will be secured and locked outside of working hours.

Hours of work

- 18.31 There will be strict control of working hours on site and material delivery times. This information will be displayed on site and will be appended to each material supply order and subcontract order.

Traffic Management

- 18.32 There will be a strict traffic management plan in place, as detailed above, that will be communicated to the entire supply chain including organisations working on site and delivering to site. Measures to ensure the safety of all users of the public highway especially cyclists and pedestrians in the vicinity of the site and especially at the access will be strictly enforced. Incoming construction traffic will be directed using signage and prior instruction. Vehicles will be kept within the unloading areas (within the site) prior to leaving site. Signage on the hoarding will be used to ensure that site access and egress points are clearly identified. Deliveries will be managed to minimise disruption to neighbouring residents and businesses and scheduled in advance on a single delivery basis to avoid any congestion. Where possible deliveries will be planned avoiding the morning rush hour and 'school run' times as this eases congestion and impact on the surrounding neighbours.
- 18.33 Site operatives are encouraged to use public transport, walk, cycle and car share. Sustainable modes of transport will be encouraged to the site for staff and by all operatives to comply with the ULEZ zone this will also be the case with our delivery vehicles in and out of site. Construction traffic will be requested to travel to and from site using the route identified on the attached map. Commitment to liaise with other contractors in the vicinity of the site to maximise the potential for consolidation and to minimise traffic impacts will be enforced. A traffic marshal will manage and direct all construction traffic arriving and departing from site. A simple delivery booking system will be implemented that aims to achieve a "one in one out" approach to avoid waiting vehicles and local congestion. All incoming deliveries will notify of their arrival 10 minutes before arrival. The traffic marshal will also see vehicles in and out of site to avoid any congestion and ensure the safety of other pedestrians, cyclists and highway users within the vicinity of site.

19.0 Construction waste

- 19.1 An area on site will be designated before the commencement of construction works. All waste will be disposed of by as certified waste carrier prior to which it will sorted into the following types:

- 19.2 Insulation and asbestos material - none has been identified on site; concrete, bricks, tiles and ceramics; wood glass and plastic; bituminous mixtures; coal tar and tar; soil and stones; gypsum, cement paints and varnishes; adhesives and sealants.
- 19.3 All waste recycling and disposal tickets will be kept on site throughout the construction period for inspection by a third party.
- 19.4 All efforts will be made to reduce waste at source and will investigate opportunities to utilise off-site manufacturing processes or alternative construction methods where appropriate. Where this cannot be achieved, suppliers will be chosen who can offer reduced packaging to their products or recyclable packaging. Materials will be brought to site using the just in time approach and will be stored and distributed in an effective and efficient manner to reduce the risk of damage/wastage.
- 19.5 Site waste will be kept to a minimum with carefully selected materials to reduce the amount of waste generated by the construction process. Our benchmark is to ensure that a minimum of 95% of our waste is diverted from landfill. A scheme for recycling/disposing of waste resulting from demolition and construction works will be employed. As much of the waste as possible will be segregated on site.

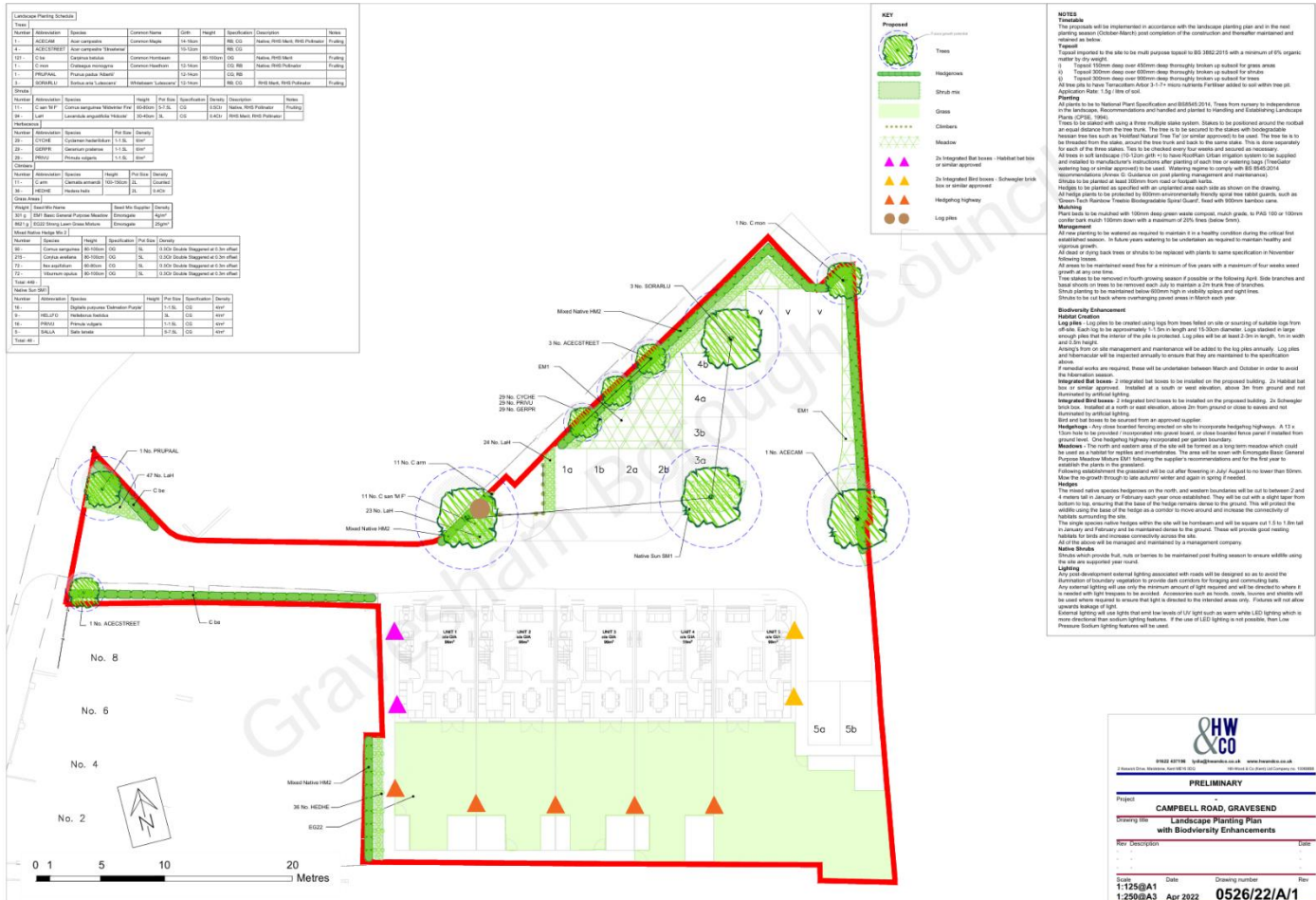
Plan 1



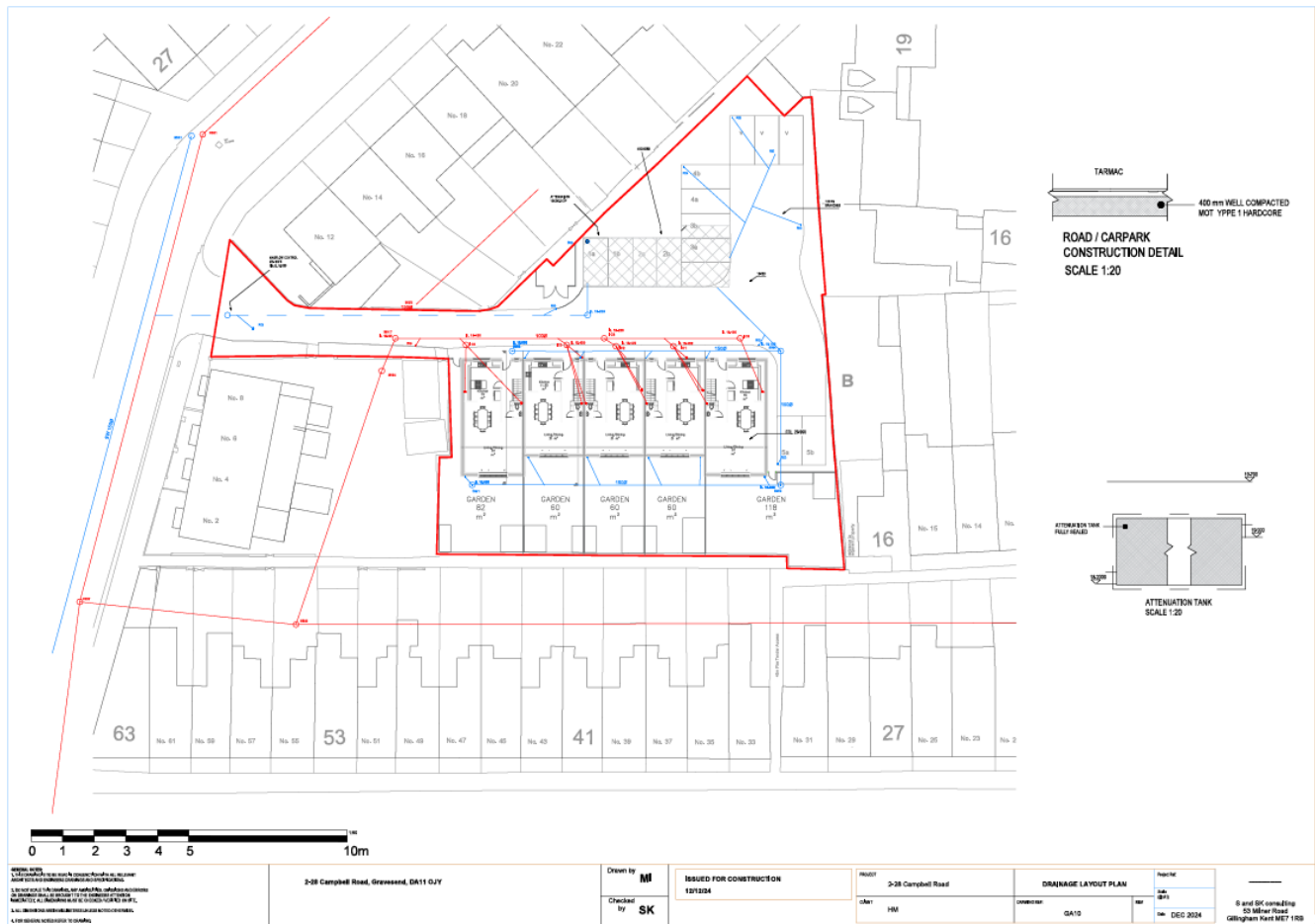
Plan 2 - HGV routing plan



Plan 3



Plan 4



Appendix One – Standard Dust Management Plan

Preparing and maintaining the site

- i. Site layout will be planned such that, where possible, machinery and dust causing activities are located away from receptors.
- ii. Solid screens/barriers will be erected around the site boundary and intelligent screening will be implemented, such as positioning site offices between potentially dusty activities and receptors.
- iii. Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- iv. Site runoff of water and mud will be avoided.
- v. Site fencing, barriers and scaffolding will be kept clean using wet methods.
- vi. Stockpiles will be covered, seeded or fenced to prevent wind whipping.

The Principal Contractor will take all necessary precautions to prevent the occurrence of smoke, emissions or fumes from site plant by implementing the following measures:

- i. The disposal of waste material by burning on site will be prohibited.
- ii. The use of generators will be avoided by using mains electricity or battery-powered equipment where practicable;
- iii. Construction plant will be well maintained and operated to minimise emissions to air;
- iv. The Site Manager will brief operatives on good practice and will carry out regular inspections to ensure that best practice means are employed across the project;
- v. A site policy will be implemented such that no vehicles are left idling and engines are switched off when not in use;
- vi. Use of low sulphur diesel fuel will be encouraged on all site mechanical plant;
- vii. Non-road mobile machinery (NRMM) will comply with the requirements of EC Directive 97/68/EC (and subsequent amendments) as a minimum.

NRMM is defined as any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The emissions requirements are only applicable to NRMM that is powered by diesel,

including diesel hybrids. Currently the requirements only apply to NRMM of net power between 37 kW and 560 kW although it is good practice to apply the same standard to all categories of NRMM.

The dust monitoring strategy will involve a combination of the following:

- i. Visual monitoring of site activities and off-site surfaces; and
- ii. Roving surveys

Visual Monitoring

Responsibility for dust monitoring will be assigned to an appropriately trained and experienced nominated representative.

The nominated representative will inspect the site at least twice daily during active works (morning and afternoon) to ensure that excess dust is not being generated and that the necessary mitigation measures are in place. A site log (daily diary) will be kept recording the daily site checks, monitoring and any action taken in response to unacceptable conditions or complaints relating to dust. The frequency of inspections will be increased when activities with a high potential to produce dust are being carried out or during prolonged dry/windy conditions. All records will be made available to the LPA upon request.

Each inspection shall be recorded on site, detailing the following:

- i. Date;
- ii. Prevailing weather conditions;
- iii. Site activities;
- iv. Plant in operation;
- v. Mitigation measures in place; and
- vi. Levels of dust observed (as described below).

As part of the daily site inspections, the observed levels of dust shall be assessed and recorded using the following scoring system:

A = No Noticeable Dust;

B = Slight Dust (localised to areas of work, with no spread beyond 10 metres from the point of activity);

C = Moderate Dust (some dust visible, but at no more than 20 metres from the point of activity, some mud on the road; and,

D = Unacceptable Dust (visible clouds of dust leaving the site or extensive mud on the road).

Where visual inspection or monitoring identifies unacceptable dust deposition or complaints are received, the cause will be identified and control measures will be enhanced in a timely manner, for example using suppressant sprays. If dust levels are uncontrollable, works will be suspended until either sufficient suppression measures can be employed or adverse weather conditions improve. Any action taken will be recorded in the site diary.

Where the source of dust emissions is identified as being off site, then this shall be recorded.

Roving Monitoring

In the event of a complaint or a score of C or D being recorded as part of the visual surveys, supplementary hand-held PM₁₀ monitoring will be undertaken at the closest high-sensitivity receptors (surrounding residential properties).

The monitoring will record concentrations of PM₁₀ over a 1-hour averaging period at each location. Recorded concentrations will be compared against the SAL specified below.

Site Action Levels

Visual Monitoring

Where a score of C or more is recorded then works shall cease in this area, the nominated person will identify the source of dust emissions, instigate further mitigation as appropriate. If appropriate, activities will be suspended until conditions improve.

Should the score of C be exceeded on more than two consecutive days, or complaints be received, additional independent monitoring will be undertaken. This will be undertaken using an MCERTS-accredited monitoring

device, which shall be set up for the duration of the working day. The location of the monitor shall be between the works and closest sensitive receptor.

The SAL for this reassurance monitoring will be a PM_{10} concentration of $190 \mu\text{g}/\text{m}^3$ averaged over a 1-hour period. In the event of a breach of the SAL, the source of dust emissions will be identified and additional mitigation will be implemented to reduce the generation of dust and migration off site. If appropriate, activities will be suspended until conditions improve.

Roving Monitoring

If PM_{10} concentrations exceed $190 \mu\text{g}/\text{m}^3$ over the 1-hour averaging period, works will be halted whilst the mitigation strategy is reviewed and additional measures are implemented. Additional measures may include increased dust suppression and/or potential improvements to perimeter protection

Appendix Two - Spill control (Source: [Emergency response / spill control - HSE](#))

Emergency response / spill control

This Technical Measures Document refers to the emergency response and spill control measures that can be adopted in plant operation to ensure safe operation.

It should be noted that the criteria requirements for the section of the COMAH Report dealing with Emergency Response Arrangements are provided in Part 2, Chapter 6 of the Safety Report Assessment Manual (SRAM). This Technical Measures Document is intended to provide additional detail on the measures that should be considered in plant design and operational procedures.

Related Technical Measures Documents include:

- [Plant Layout](#)
- [Design Codes - Plant](#)
- [Design Codes - Pipework](#)
- [Plant modification /change procedures](#)
- [Maintenance procedures](#)
-

The relevant Level 2 Criterion is [5.2.1.3\(29\)d, e](#).

Safety management systems

Generation and implementation of effective emergency response and spill control procedures are fundamental aspects of a safety management system.

Site emergency plan

The on-site emergency plan, prepared for Regulation 9 of COMAH should address procedures for dealing with emergency situations involving loss of containment in general terms. Full detail of the required contents is provided in Part2, Chapter 6 of the SRAM. In brief, the main points for inclusion are:

- Containing and controlling incidents so as to minimise the effects and to limit danger to persons, the environment and property;
- Implementing the measures necessary to protect persons and the environment;
- Description of the actions which should be taken to control the conditions at events and to limit their consequences, including a description of the safety equipment and resources available;
- Arrangements for training staff in the duties they will be expected to perform;
- Arrangements for informing local authorities and emergency services; and
- Arrangements for providing assistance with off-site mitigatory action.

The emergency plan should be simple and straightforward, flexible and achieve necessary compliance with legislative requirements. Furthermore separate on-site and off-site emergency plans should be prepared.

Emergency operating procedures / training

The emergency procedures should include instructions for dealing with fires, leaks and spills. The procedure should describe how to:

- Raise the alarm and call the fire brigade;
- Tackle a fire or control spills and leaks (when it is safe to do so);
- Evacuate the site, and if necessary nearby premises.

Area evacuation

Evacuation of areas in the event of fire or toxic gas emission should be addressed in an emergency evacuation procedure. This should specify designated safe areas, assembly points and toxic gas shelters. The procedure should also identify responsible personnel whose duties during area evacuation include:

- Responsibility for a specific area;
- Collecting ID badges from plant racks;
- Ensuring roll calls are undertaken to identify missing persons;
- Communication of missing persons to central emergency services.

Fire fighting

A fire fighting strategy should consider:

- Appointment of fire wardens, with subsequent training;
- Location plans of fire hoses, extinguishers and water sources;
- Access for emergency services;
- Provision of firewater lagoons.
-

Removal of substance to safe place

The emergency spill control procedure should include the following key sections:

- Spills involving hazardous materials should first be contained to prevent spread of the material to other areas. This may involve the use of temporary diking, sand bags, dry sand, earth or proprietary booms / absorbent pads;
- Wherever possible the material should be rendered safe by treating with appropriate chemicals (refer to Stabilisation / dilution to safe condition);
- Hazardous materials in a fine dusty form should not be cleared up by dry brushing. Vacuum cleaners should be used in preference, and for toxic materials one conforming to type H (BS 5415) should be used;
- Treated material should be absorbed onto inert carrier material to allow the material to be cleared up and removed to a safe place for disposal or further treatment as appropriate;
- Waste should not be allowed to accumulate. A regular and frequent waste removal procedure should be adopted.

Stabilisation / dilution to safe condition

Once the hazardous material has been contained to prevent spread of the material to other areas, the material should be treated wherever possible to render it safe. Acids and alkalis may be treated with appropriate neutralising agents. Due to the differing properties of the various groups of chemical, an appropriate treatment

strategy with suitable chemicals should be established in each case. For example, highly concentrated hydrochloric acid will fume when spilled so prior to neutralisation the spill should be diluted with a water spray. Once the material has been treated the cleared up the area should be washed with large volumes of water. Most chemical plants and associated areas are serviced by chemical drains that feed to the effluent treatment plant. The washing operation will represent an abnormal loading on the effluent treatment plant, and it is vital that in any situation where this is likely to happen the staff responsible for operation of the effluent treatment plant are notified so that appropriate measures can be adopted. The effluent treatment plant operatives are likely to require the following information:

- Approximate quantity of hazardous material;
- Approximate composition of hazardous material;
- Physical properties of hazardous material;
- State of hazardous material (whether neutralised etc.).

In the case of fire water run off, much larger volumes of water are employed and the provision of firewater lagoons to contain potentially toxic firewater is required.

Availability of neutralising substances / foam

Process specific emergency spill kits (acid, alkali, solvent, toxic etc) and appropriate personal protective equipment should be readily available with supporting procedures. These spill kits should be maintained on a regular basis to ensure that they are always available and fit for purpose. This ensures that the most appropriate measure is at hand to deal with a spill or fire in the most effective way.

Issues that should also be addressed include:

- Containment
- Maintenance and condition of fire hoses, extinguishers.

Status of guidance

Existing guidance provides comprehensive information with respect to best practice for emergency response and spill control procedures.

Guidance for emergency responses for chlorine, anhydrous ammonia, LPG, nitrocellulose, flammable dusts, and flammable liquids storage plants and chemical warehouses are given in the specific guidance notes listed below.

Additional material providing much insight into analysis of offsite consequences through a risk management program is now available from the United States Environmental Protection Agency. This provides guidance on offsite consequence analysis for toxic gases, toxic liquids, and flammable substances. The risk management analysis will have a significant impact on the format and content of an emergency response or spill control procedure.