



Rochdale & Littleborough FRMS Phase 1B - Littleborough

**Discharge of Condition 9: Construction Environmental
Management Plan**

TBC-VSL-00-ZZ-RP-W-0004 Rev B

May 2023

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

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We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

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1.0 Introduction

1.1 Planning consent

1.1.1 On 14 July 2022 Rochdale Metropolitan Borough Council (RMBC) granted planning consent for Phase 1B of the Rochdale & Littleborough Flood Relief Management Scheme (FRMS) under planning reference 22/00485/FUL.

1.1.2 A number of planning conditions were attached to the consent, including condition 9 which reads:

No development shall take place (including demolition, ground works, vegetation clearance) within each development area until a construction environmental management plan (CEMP) has been submitted to, and approved in writing by the Local Planning Authority.

The approved CEMP shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved CEMP during the construction period.

Reason: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment during the construction phase in accordance with Policies DM1, G6 and G7 of the adopted Rochdale Core Strategy and the National Planning Policy Framework.

1.1.3 The majority of the requirements identified in the above policies have already been considered during the determination of the planning application. The granting of planning consent and in particular the approval of scheme drawings listed therein has locked in the design response to the policies' demands.

1.1.4 Those parts of the policies which are not already settled via the approved scheme are reproduced below. Condition 4 requires approval of a Construction Traffic Management Plan and Condition 6 requires approval of a Construction Management Plan. These two conditions are the subject of separate documents, attached as appendices to this document. This document responds to the outstanding policy issues.

1.1.5 Those sections of Policy DM1 which are relevant to the consented development, and to which this submission responds, are reproduced below:

DM1 - General development requirements

All development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they:

...

d. Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary;

...

f. Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality;

...

i. Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out;

...

1.1.6 Policy G6 is reproduced below.

We will expect development proposals and other proposals affecting green infrastructure to:

a. be consistent with the above focus¹ for green infrastructure and the wider than local value that green infrastructure can have;

- 1.1.7 Sections of Policy G7 which are relevant to the consented development, and to which this submission responds, are reproduced below:

We will expect development proposals and improvements to:

a. Protect and include existing biodiversity (including established biodiversity interest on brownfield land) within new developments, public realm and open spaces and meet the requirements of the Biodiversity and Development SPD, Greater Manchester and Local Biodiversity Action Plans;

b. Protect and enhance existing features such as peatland, ponds, wetlands, reservoirs, mill lodges, trees, hedges, wooded areas, meadows, flora and fauna;

...

- 1.1.8 This document is submitted in discharge of Condition 9.

2.0 Use of Best Practice Measures

2.1 Environmental Action Plan

- 2.1.1 The Applicant confirms that environmental protection, mitigation and enhancement has been incorporated into the scheme design wherever possible. Environment Agency will require use of best practice mitigation measures in its delivery of the development. To support this aim, the Applicant has developed an Environmental Action Plan (EAP) which summarises the requirements with which its Constructor will be required by contract to comply during construction of the development. The EAP refers to the use of best practice measures and mitigation, as detailed in the Environmental Statement submitted with the planning application. It sets out specific objectives and targets defining the way in which the measures detailed in the Environmental Statement (ES) and its relevant findings will be addressed during the implementation phase of the project (detailed design, construction and post-construction phases). It also details roles and responsibilities of those involved in the proposal and refers to all temporary and permanent works.
- 2.1.2 Some topics included in the EAP are subject to other planning conditions, for which independent submissions will be or have been made. This submission therefore only addresses those remaining environmental matters that have not already been provided for elsewhere.
- 2.1.3 For the avoidance of doubt, the following matters are subject to separate planning conditions:
- Design of the vehicular access to the development – Condition 3;
 - Management of construction traffic – Condition 4;
 - Management of archaeological resources – Condition 5;
 - Management of noise and vibration – Condition 6;
 - Management of unforeseen contamination – Condition 7;

¹ The focus within the Roch Valley corridor is “establishing a Roch Valley Trail between Heywood and Littleborough, opening up visibility, creating and enhancing recreation destinations and improving access to and from urban communities. The valley will be enhanced as a key landscape feature forming a part of Greater Manchester's Rochdale Core Strategy Adopted October 2016 strategic green infrastructure network providing high quality recreational and tourism opportunities, an ecological corridor, stimulus and support for regeneration and growth along the river valley corridor in Heywood, Rochdale and Littleborough and key flood risk management assets e.g. for flood storage and sustainable drainage.

- Prevention of habitat disturbance for otter and fish – Condition 8;
- Management of invasive plant species – Condition 10
- Protection of retained trees – Condition 18.

3.0 Air Pollution & Dust

3.1 Air Pollution

3.1.1 Air Quality is a major issue that can affect human health and the environment. In the UK, alongside road transport, construction projects are major contributors to poor air quality. VolkerStevin under ISO14001 aims to mitigate their contributions through:

- Undertake daily plant checks
- Implementing a strict no idling policy
- Mains Power will be utilised over diesel generators where possible
- Low emission plant (Euro engine 3B) used where possible on site

3.2 Dust management

3.1.2 As well as causing a nuisance to neighbours, dust can lead to both health issues to persons on and off site and can have adverse ecological impacts. Potential sources of emissions must be identified, and appropriate controls applied to eliminate or minimise effects on neighbours and other sensitive receptors.

3.1.3 Where possible, dust creating activities will be completed away from sensitive receptors e.g., crushing or cutting of concrete materials. The following control measures will be implemented as a minimum:

- All dust-producing activities will be dampened down, preferably at source
- Dust controls will be planned prior to demolition and maintained during demolition
- Debris netting will be utilised during potentially dusty demolition and construction activities
- Hard standing will be provided as early as possible to provide a running surface for vehicles so that it is easier to control dust emissions
- Wheel wash facilities will be provided where mud is likely to be transported onto the public highway, this will be combined with road sweeping to reduce the possibility of dust even further
- Haul routes will be regularly damped down with mobile suppression systems and regularly cleaned
- Maximum speed limits of 5mph on unsurfaced haul routes and work areas and 10mph on surfaced haul routes and work areas will be imposed
- All vehicles carrying loose or potentially dusty material to or from the site are to be fully sheeted
- Drop heights will be minimised from conveyors, loading shovels, hoppers and other loading or handling equipment, additional water suppression will be utilised where possible
- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction
- Vehicles will be well maintained to minimise release of particulate matter through the exhaust

- Dust monitoring will be carried out where dust is likely to cause potential nuisance or damage to adjacent sensitive receptors. The results of this monitoring will be assessed against background readings to determine any effect of our works on dust levels

4.0 Light Pollution

- 4.1.1 VolkerStevin will ensure considerate use of temporary lighting to minimise winter and night-time visual impacts (primarily on sensitive residential receptors around Gale (including Reddyshore Brow / Shottwood Fold).
- 4.1.2 Security lighting on the Site shall be limited to the minimum required with directional cowls fitted to prevent upward light spill and pollution.
- 4.1.3 Security on site overnight – but whole site won't require lighting. There may be patrols though due to the size of the site. Security likely to be on the compound where low level lighting will be installed.

Please see Appendix 2A – 2E where CCTV and Lighting is shown.

The lights will be motion censored and guards will have location points that need scanning to log patrols over the night patrols.

5.0 Odour Management

- 5.1.1 Ground investigations have already been undertaken , and the analysis of historical data identifies that there is a possibility of old uses of the site. Extensive GI has already been undertaken and the findings don't raise a risk of odour generation, therefore no mitigation necessary. Vigilance will be maintained with regard to odorous material.
- 5.1.2 There is a historic landfill – mentioned in the scope, underneath Greenvale Business Park – however, distanced from our works and unlikely to be impacted.

6.0 Adequate Access

- 6.1.1 Site specific access details and constraints at each of the work locations are provided below: Notice of Entry's will be served on landowners by the EA 2 weeks prior to required access.

6.2 4C1 Grove Lodge

- 6.2.1 The main access point is to be from Todmorden Road.
- 6.2.2 A secondary access point is through the working factory yard of "Fothergill Crenette" and over an existing railway bridge which has limited width;
- 6.2.3 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0011 in Appendix 1A.

6.3 4D0 Shottwood Fold/Reddyshore Brow

- 6.3.1 The main access point to the works area is via main access road Reddyshore Brow and across an existing highway bridge to residential properties on Shottwood Fold;
- 6.3.2 Additional access may be gained, with agreement of all landowners, via the rear garden of each affected property. Access to the rear property of 19 Shottwood Fold may be gained through the boundary fence/hedgerow running along the Public Right of Way footpath east-west, from Todmorden Road to the railway footpath crossing.

6.3.3 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0011 in Appendix 1B.

6.4 4C0 Gale Storage Reservoir (Gale East)

6.4.1 The main access point to the works area is via Lightowlers Lane, crossing an existing canal bridge and passing through the working factory yard of Fothergill Crenette.

6.4.2 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0100 in Appendix 1C.

6.5 4C0 Gale Storage Reservoir (Gale West)

6.5.1 The main access point is from Todmorden Road via a temporary access ramp constructed during a previous contract of the Littleborough and Rochdale Flood Risk Management Scheme. This temporary ramp is to be removed by the Contractor ideally prior to issue of the preliminary certificate by the Reservoirs Act Construction Engineer but in any case, no more than 5 weeks after issue of the preliminary certificate by the Reservoirs Act Construction Engineer.

6.5.2 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0100 in Appendix 1C.

6.6 4E1 Greenvale Business Park – Units 5a-2

6.6.1 The access highway bridge within the business park, off Todmorden Road, shall not be blocked at any time. This access highway bridge is used by HGV's whose ability to use the bridge shall not be hindered throughout the works period.

6.6.2 The Contractor shall contact businesses directly and provide advance warning of any potential impact to access or interruptions to their normal operations.

6.6.3 The Contractor shall provide full time dedicated traffic marshals to coordinate with the Business Park to minimise disruption to daily operations within the Business Park during the construction works carried out for this area of the flood risk management scheme.

6.6.4 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0006 in Appendix 1D.

6.7 4E3 Greenvale Business Park – Rear of Centre Vale

6.7.1 The main access to this area of works is via a private entrance located approximately opposite Centre Vale Close off the A6033 Todmorden Road.

6.7.2 This access route passes through a parcel of land to the rear of the properties of Centre Vale and Moorland Street, that is currently used for the grazing of livestock such as poultry.

6.7.3 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0006 in Appendix 1D.

6.8 4E4 Greenvale Business Park – G&H Caravan Storage

6.8.1 The main access to this area of works is via a private entrance leading to a caravan storage business. The entrance is located opposite and approximately 30m south of Carriage Drive, off the A6033 Todmorden Road.

6.8.2 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0006 in Appendix 1D.

6.9 4H0 Ealees Brook

- 6.9.1 Access to this area of works is via the main business entrance point off the B6225 Canal Street. There is only one access to the Working Area which is shared with operational businesses and a private landowner(s).
- 6.9.2 See Figure IMNW0001000-JAC-ZZ-4B0-DR-C-0004 in Appendix 1E.

7.0 Land Stability & Contaminated Land

7.1 Land stability

- 7.2 There are no known constraints regarding unstable land, therefore no mitigation measures are proposed.

7.3 Contaminated land

- 7.3.1 The ground investigations have identified contaminated material at Greenvale Business Park and Ealees Brook. This includes made ground with elevated levels of contaminants, as well as identified asbestos and physical hazards such as metal and glass fragments. There is also the potential for unidentified contaminated material to be present in all sites. The relevant authorities will be notified if any contaminated land is discovered.
- 7.3.2 VolkerStevin shall plan methods of working to reduce risks to human health from below ground excavation, earthworks, spoil management, mass haul, dewatering and groundwater management, potentially contaminated spoil management disposal and reinstatement.
- 7.3.3 To Reduce/ prevent contamination of controlled waters. VolkerStevin shall prepare Method statements for all works to ensure likelihood of a pollution incident is minimised. The method statements would include the preparation of an Emergency Response Plan and compliance with the Environment Agency's Pollution Prevention Guidance and updated guidance documents.
- 7.3.4 Ensure excavated/ disturbed contaminated land is dealt with correctly (if required). VolkerStevin shall create segregated stockpiles of excavated material by lithology (Topsoil, made ground, natural ground). Refer to MMP for full details.
- 7.3.5 VolkerStevin shall carry out chemical testing/ analysis on made ground, re-worked soils and any previously unidentified contaminated material to identify any contamination. All materials to be reused and or disposed of as appropriate dependant on the chemical testing results.

7.4 Ground and Water Pollution

- 7.4.1 If works are not planned properly, construction activities have the potential to cause pollution to the land and water environments.
- 7.4.2 It is an offence to cause or knowingly permit any solid, noxious or polluting material to enter controlled waters unless consent is granted by the Environment Agency.
- 7.4.3 Where information on existing ground conditions is not already available, investigations will be undertaken to determine the existing conditions of the site, and any contamination already present.
- 7.4.4 Where required, a remediation strategy will be implemented to deal with any existing contamination:
- Areas of known contamination will be fenced off and access only made available to authorised persons.
 - Where contaminated arisings need to be stockpiled, these will be placed on and covered by a polythene liner or similar to prevent cross contamination with the underlying ground.

- Where dewatering of excavations is required, this will be carried out in accordance with the Environment Agency position statement Temporary Water Discharges from Excavations.
- When pumping anything other than clean uncontaminated rainwater, a settlement tank is to be used to remove suspended solids and if required, hydrocarbons.
- An Environmental Permit (EPR/ZB3392WR) has been issued to site prior to works commencing. An application to surrender the permit will be submitted once VolkerStevin no longer require the permit, i.e. construction of the scheme has been completed and there will be no further discharges under the permit.
- Fuel / oil and chemical storage along with all refuelling will take place at least 10m away from water courses or surface / foul drainage.
- Concrete washout will be undertaken into a lined skip or pit and will not take place within 10m of a watercourse or surface / foul drainage.
- Wash waters from wheel washing will not be allowed to enter water courses or drainage.
- Controls to prevent uncontrolled runoff into watercourses will be put in place and agreed with the Environment Agency where required.
- Where abstraction of water is required, only 20m³ per day will be abstracted from surface / ground water. If more water needs to be abstracted, consent will be sought from the EA.
- A flood risk activity permit will be sought from the Environment Agency as the works are required in, over or within 8m of a main river (River Roch).

7.5 Incident Reporting Procedure

- 7.5.1 In the event of a potential or actual environmental incident being noticed, the person(s) identifying it shall firstly take immediate steps to prevent or stop the cause and minimise the resulting additional impacts if safe to do so, for example;
- Fix or maintain silt protection measures
 - The installation of additional silt protection measures
 - Isolate any source of hydrocarbon spill and utilise spill pads
 - Deploy an oil boom downstream of any spill in proximity to a watercourse.
- 7.5.2 The person who identifies the incident shall promptly report the incident to the Project Manager, who shall then notify the VolkerStevin Environmental Manager and EA, in order to relay the details of the incident and to receive any necessary expert guidance and actions.
- 7.5.3 When safe to do so, the identifying person(s) must attempt to collect as much evidence and details of the incident as possible. This should include photographs and notes, weather conditions, details of substances and equipment involved.
- 7.5.4 Within 2 days of the incident, an HSE-31 Incident Notification form shall be completed and sent to the VolkerStevin Environmental Manager for internal recording, referencing the incident number provided by EA.
- 7.5.5 Where Environment Agency advises that they wish to attend the site of the incident and/or provide corrective guidance, the Contractor shall then fully cooperate and resolve the incident to EA's satisfaction.

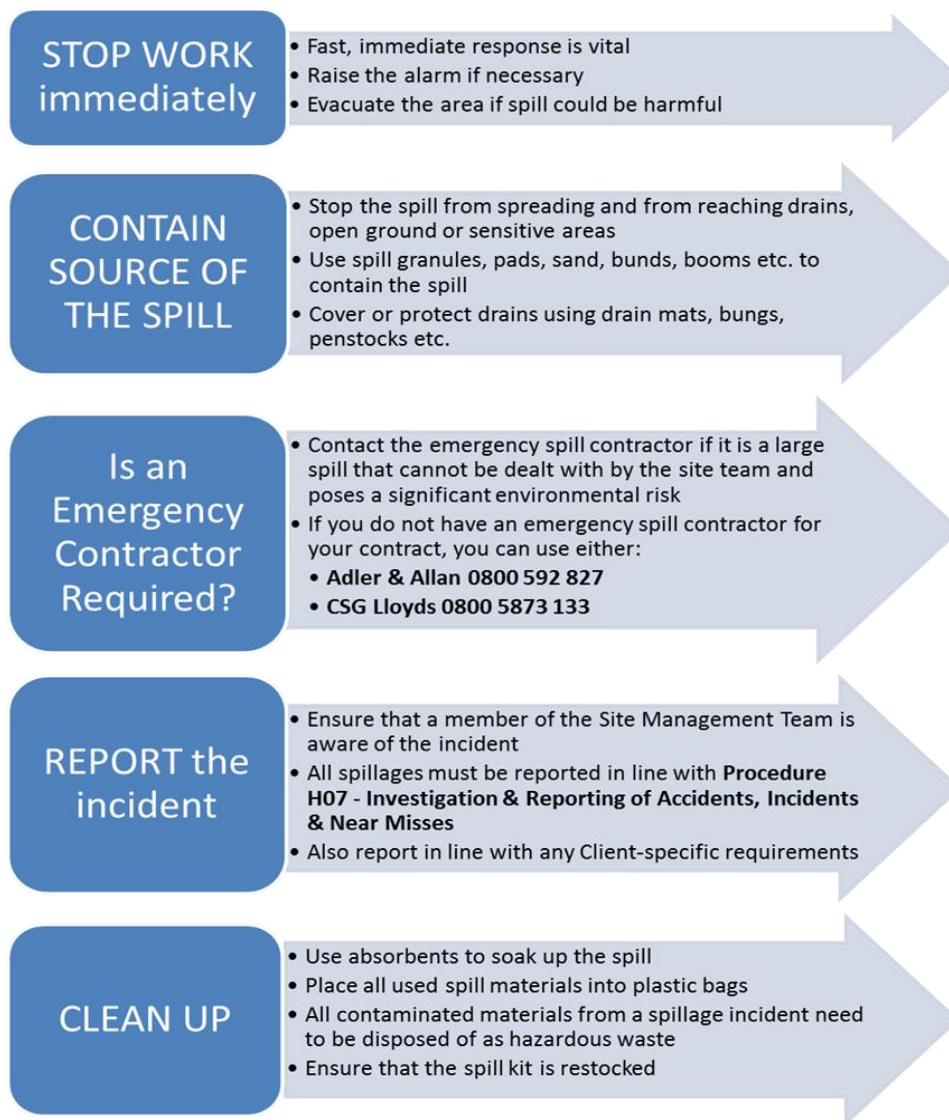


Figure 7.1 - Actions in the Event of a Spillage

8.0 Protection of Flora & Fauna

8.1.1 The following points are set out for reasonable measures for avoidance of habitat disturbance, impacts on protected species and invasive species.

8.2 Prior to works commencing

- Construction can have significant and irreversible effects on species and habitats both on and off site. Jacobs are the appointed design ecologists associated with this scheme. The assigned Ecological Clerk of Works (ECoW) is to be confirmed at the time of writing. VolkerStevin will manage work locations, to minimise any ecological effects, and where possible enhance the ecological condition of the site.
- Documentation including the EAP and other documents referenced within it will be reviewed to ensure sufficient information is available to manage ecological issues, and where necessary, further survey works will be undertaken.
- Pre-commencement surveys will include but not be limited to, bat survey of trees previously identified as being suitable for roosting bats that require felling or heavy

pruning; and camera trap surveys of the hover/sprainting location under Greenvale Business Park.

- In order to avoid impacts to breeding birds, vegetation clearance would ideally take place outside of the bird nesting season (taken as March to August inclusive). Where this is not possible, a breeding bird check would be undertaken no more than 24 hours prior to vegetation removal. If evidence of nesting is found within or immediately adjacent to the construction area works would be delayed until the nest had naturally disbanded. Breeding bird checks would also be required for riparian walls which are to be affected by the works as suitable nesting opportunities have been identified within these walls. Where vegetation clearance is to be undertaken within this sensitive bird breeding period, an appropriately qualified ecologist should undertake breeding bird checks.
- Where protected species are identified on site, mitigation requirements of ecology surveys will be briefed to the workforce and fully implemented on site
- Ecologists will be utilised to provide a watching brief where works could impact upon protected species
- Where required works will be programmed in accordance with the guidance provided by CIRIA C567 Working with Wildlife, e.g., tree and shrub clearance will be undertaken outside of bird breeding season (March - July).
- Retained vegetation will be fenced off in line with the tree retention plans and RAMS for habitat disturbance, appropriately signed and unauthorised entry to the area prohibited.
- Additional heras screening fence will be positioned on the right-hand bank of the River Roch between the confluence with Greenvale Brook and the bridge into Greenvale Business Park to provide screening of the watercourse for otter.
- Materials and plant will not be stored under the canopy of retained trees
- If invasive species are identified after works have begun, works will cease, the area will be fenced off and the Environmental Manager contacted
- See Discharge of Conditions 16 - RAMS for Habitat Disturbance Plans and 18 - Invasive Species Method Statement for further guidance.

8.3 During the works

8.3.1 Precautionary Method Statement

- There are some aquatic flora (rannunculus) within the River Roch, which should be identified and protected during the works, via translocation and suitable storage while the works are being undertaken. A specific method statement on rannunculus translocation will be required.

8.3.2 Inspection and Monitoring Arrangements

- Monitoring of site operations will be carried out on a day-to-day basis by site management. Weekly inspections will be conducted by site staff using HSE-07 *Site Safety & Environmental Inspection Record* on a rota basis facilitated by HSE-06 *Weekly Site Safety & Environmental Inspection Rota*. Health & Safety, Environmental and Quality Managers will also carry out regular inspections and audits. Additional inspections will also be carried out by Directors and Senior Managers. Subcontractor performance is used as part of future selection processes and contributes to the further improvement of supply chain performance through the application of lessons learnt. Investigations will be carried out by site staff, or the relevant manager, of all incidents and complaints whether causing injury, loss, or near miss. Records using HSE-06 and HSE-07 must be stored in folder 13.4 *HSE-06 Register and HSE-07 Inspection*.

- An ECoW and Geomorphological Clerk of Works should ensure that compliance with the EAP is managed. Compliance should be monitored via regular site inspections recorded via the weekly ECW site record report.

APPENDICES

Appendix 1A - IMNW0001000-JAC-ZZ-4B0- DR-C-0011

Appendix 1B - IMNW0001000-JAC-ZZ-4B0- DR-C-0011

Appendix 1C - IMNW0001000-JAC-ZZ-4B0-DR-C-0100

Appendix 1D - IMNW0001000-JAC-ZZ-4B0- DR-C-0006

Appendix 1E - IMNW0001000-JAC-ZZ-4B0- DR-C-0004

Condition 4 – Construction Traffic Management Plan

Condition 6 – Construction Management Plan

Condition 10 – Invasive Species Method Statement

Condition 16 RAMS for Habitat Disturbance

Condition 18 – Tree Protection Scheme