

Gimlet Rock Caravan Park

New Pontoons, gangway and piles

Construction, Environment Management plan (CEMP)

Case Ref number CML2531

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1 Introduction

This Construction Environmental Management Plan (CEMP) relates to the proposed installation of a new floating pontoon, access gangway and piles at the Gimlet Rock Caravan park, Pwllheli. This CEMP provides a framework for the management of environmental issues on the project to ensure legal, contractual, and procedural requirements are met. The CEMP has been prepared in accordance with condition 3.24 of the Marine Licence issued for the works CML 2531 .

This site-specific CEMP has been developed to avoid, minimise and/or mitigate any construction effects on the environment, mainly impact upon the Pen Llyn a'r Sarnau SAC which has its boundary some 400m from the works

This CEMP contains, or makes reference to, sufficient information to identify how the proposed works will be managed from an environmental perspective. It defines the project specific environmental risks and the measures applied to control these risks to an acceptable level.

The measures described within this CEMP will form part of the scope of works for the appointed contractor.

Therefore, the contractor is responsible for ensuring that all measures described are in place throughout the duration of the works and are adequately communicated with the workforce.

2 Project Description

The site is located on the banks of the Afon Erch, some 400m into the mouth of the river at the end of the Gimlet rock caravan park as seen in Figure 1 and Figure 2 site plan.

The pontoon is to be provided to allow uses of the caravan park to safely berth vessels at high to mid tide to visit the site. At present there is little facility to allow visitors to use the park facilities, this new pontoon provides a safe berthing facility. Access is via an access gangway that rises and falls with the tide to allow access throughout the tide cycle.

The form of pontoons will be a proprietary pontoon manufacturer, secured to piles driven into the seabed.

The drawings attached show the outline design of the pontoon layout. The pontoons have a total length of 36m and will rest on the seabed on very low tides

Pontoon Location – Overall Plan



Pontoon Location – close up plan (Not to scale)



3 Potential Impacts of the proposed works

The following unmitigated impacts upon features of the Penllyn a'r Sarnau SAC were identified within the HRA prepared for the proposed works, and the purpose of the CEMP is to specify measures reduce the risk of these impacts occurring during the works:

It is possible that the machinery and equipment used for the proposed works on site could be a source of pollution, which could directly affect habitats and species associated with the site. Such pollution incidents would cause localised pollution of the immediate habitat and water environment, and depending on the scale, flows and tides at the time, could spread both upstream and downstream.

The movement and deposit of beach material could also be a source of pollution, should the material be contaminated prior to being moved. Concentrations of polluting material could be released on the foreshore in the event of a one-off accident or spillage. Likewise concrete spills could also have a negative impact on the Afon Erch and surroundings.

Piling and boreholes may impact birdlife and mammals.

4 Mitigation Measures

The following measures shall be implemented during the works in order to reduce the risk of impacts described above occurring. The appointed contractor has responsibility for ensuring that all measures are in place prior to commencement of works and are maintained throughout the duration of the works.

Excavation. Very little beach material will be removed, mainly at the site investigation stage. A visual check for contaminants and/or litter should be undertaken. Any material believed to be contaminated should be stockpiled within a protected area and the client notified at the earliest opportunity for further instruction; Any litter identified should be put to one side and discarded. Materials to be moved directly from collection area to deposit area. No temporary storage shall take place within the foreshore.

Access. To get to the pontoon locations, access to be via the existing opening near the top of the new concrete slipway across the top of the beach to pontoon location, to keep potential habitat disturbance to a minimum.

Plant General. Plant will be suitable for use in marine environment with skilled operatives used to the tidal environment. Pollution spill kits to be readily available on site within plant/machinery at all times, with staff suitably trained in how to deploy.

Condition 3.15 Spillage of pollutants. To mitigate risk of fuel spill when filling up excavators, dump trucks etc there will be a site spill kit at the fuel bowzers / tanks & in the working area, all plant is to carry a suitable size spill kit. Other mitigation will be:-

- Personnel are to be briefed on the location of the Spill Kits & their application during site inductions.

- All used spill kit pads, absorbents, etc. are to be disposed of in the site oil waste bin.
- Any fuel is to be stored no closer than 10m from any water course/ tidal body & surface water drainage.
- Fuel is to be stored either within a bunded storage tank/bowser with a minimum of 110% of the capacity of the drums volume.
- Biodegradable lubricant and hydraulic oil to be used in plant machinery. Biodegradable oils are less toxic than most synthetic oil but should still be stored to the same standards as other oils and prevented from entering the water environment.

The contractor will be required to adhere to recommendations and guidance in *Guidance for Pollution Prevention - Works and maintenance in or near water (GPP 5)*. This will be a contractual requirement.

Condition 3.17 Cleaning of equipment and plant. It is appreciated that there would be concern about potential invasive species and pollutants brought to site from other regions on the borehole rigs, excavators and other plant. To mitigate this risk the plant will be pressure washed clean with clean water prior to being delivered to site to ensure the removal of any potential harmful contaminants and invasive species that may present a biohazard. In particular Condition 3.17 of the Licence requires that equipment, machinery and PPE are washed with freshwater and/or thoroughly airdried before deployment and before moving between locations.

The Contractor when appointed, will be referred to NRW's Guidance for completing NRW's *Marine Non-native Species Biosecurity Risk Assessment and Management Plan* in relation to minimise biosecurity risks. It will be a contractual requirement to wash equipment as the paragraph above.

Condition 3.18 Reporting of artefacts. Any artefacts found will be retained in accordance with the requirements of this condition.

Condition 3.19 Coatings. Piles, pontoons and floats, will have coatings that are appropriate for marine conditions. The environmental credentials of the pontoons will be checked to ensure best environmental practice. The pontoons will be sourced from a reputable pontoon manufacturer.

Condition 3.20 Use of concrete. Concrete mixing and washing areas should be contained and will be sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse. A skip is often used for this purpose.

Condition 3.21 Concrete Cure Time. The concrete specification and related materials will be suitable for use in the marine environment and works will be timed such that curing time is maximised (i.e. works impacted by tidal flow reduced to minimum)

The works entail the placement of very small volume of concrete in the piles once driven, likely to be no more than 6m³. The contractor will be subject to strict control over the placement of concrete.

Given the location of the works, it is unlikely that pollution of drains will occur, especially with careful planning and location of slurry washout facilities. None the less the Contractor will provide, before works commences on a plan the following

1. **Designated washout area:** Establish a specific, clearly marked area for concrete and cement mixing and equipment cleaning.
2. **Location:** The washout area should be on impermeable ground, at least 10 meters away from any surface water drains, watercourses, or soakaways.

3. **Containment:** The area will have a containment system, such as a bunded, leak-proof skip.
4. **Drain mapping and color-coding:** diagram showing any drains in the area near the beach
5. **Surface water drains:** If any drains lead from the designated wash out area to the sea, these will be painted with a blue symbol to indicate they lead directly to a watercourse.
6. **Foul water drains:** Paint foul sewer covers red to indicate they lead to a sewage treatment plant.
7. **Gully and drain protection:** Cover or protect all nearby stormwater drain inlets, gullies, and culverts before concrete work begins.
8. **Staff training:** All on-site personnel must be trained on the drainage plan, proper material disposal, and emergency spill procedures.
9. **Regular inspections:** Conduct daily inspections of the washout area, drain covers, and containment systems, especially after heavy rain, to check for damage and ensure they are not exceeding capacity.

Condition 3.22 Percussive Piling. If percussive piling is used, soft-start procedures will be used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration will be a period of no less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.

3.23 Piling Time Restriction There will be a 12 consecutive hour break in piling activities in any 24-hour period.

5 Incident Management

In reference to **Condition 3.14, Pollution Prevention**, the approach to a pollution incident is to be:

Stop – Contain – Report

Stop

Stop all works pertaining to the incident, for example, to prevent further spillage turning of the valves/taps, righting the drum, stopping/restrict the flow at the source etc

Contain Spill kits are to be provided on site, however further measures such as using sand or earth, absorbent pads, booms or skimmers or digging trenches etc. Use a spill kit to mop up the spillage. Contaminated material must be disposed of as hazardous waste.

Report All pollution incidents are to be reported to the Project Manager will take the appropriate administrative action, which will include notifying Natural Resources Wales (0300 065 3000)