



EAST PARK ENERGY

East Park Energy

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Preliminary Environmental Information Report Volume 2 – Technical Appendices

**Appendix 2-3: Outline Construction Environmental
Management Plan**

September 2024

Version 01

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Appendix 2-3: Outline Construction Environmental Management Plan

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1.0 INTRODUCTION

1.1 Background

- 1.1.1 This outline Construction Environmental Management Plan (oCEMP) has been prepared for the Construction Phase of the East Park Energy project (hereafter referred to as ‘the Scheme’).
- 1.1.2 The Scheme is classified as a Nationally Significant Infrastructure Project (NSIP) and therefore BSSL Cambsbed 1 Ltd (‘the Applicant’) is applying for a Development Consent Order (DCO) to construct, operate and ultimately decommission the Scheme. The Scheme is considered to be ‘EIA development’ as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’)¹, requiring an Environmental Impact Assessment (‘EIA’).
- 1.1.3 The purpose of this oCEMP is to set out how the necessary environmental mitigation and monitoring identified as part of the EIA and set out in the PEIR will be delivered during the construction of the Scheme, and ensure that this mitigation is secured and embedded into project delivery.
- 1.1.4 This oCEMP is concerned with the Construction Phase of the Scheme, the following documents cover the separate operational and decommissioning phases:
- **Operational Phase** – outline Operational Environmental Management Plan (oOEMP) – *PEIR Volume 2 Appendix 2-4*; and
 - **Decommissioning Phase** – outline Decommissioning Environmental Management Plan (oDEMP) – *PEIR Volume 2 Appendix 2-5*.
- 1.1.5 If the DCO is granted, this oCEMP will be developed into a detailed Construction Environmental Management Plan (CEMP) once a contractor is appointed. The CEMP will be in substantial accordance with this oCEMP, and will be a requirement of the DCO for submission and approval by the Local Planning Authorities (LPA) prior to construction.

1.2 Document Structure

1.2.1 This oCEMP is structured as follows:

- **Introduction** – provides an introduction to the document and defines the structure of the oCEMP;
- **Scheme Description** – provides a summary of the Site and Site Context, a description of the Scheme, and sets out a summary of the expected construction activities, staffing, and equipment;
- **Roles & Responsibilities** – sets out the roles & responsibilities that will need to be defined at the Construction Phase, and identifies stakeholders relevant to the environmental management of the Construction Phase;
- **Construction Environmental Management** – sets out principles and site rules to be applied in the construction of the Scheme, and how communication with third parties will be undertaken during construction;
- **Environmental Mitigation Measures** – sets out the environmental management and mitigation measures that are required to address the effects of the Scheme during the Construction Phase, as relied on or identified in the PEIR;
- **Implementation of Management Plan** – provides a summary of the key requirements that must be within the final CEMP to ensure successful implementation of this oCEMP; and
Monitoring and Maintenance – sets out the procedures for monitoring and ensuring compliance with the CEMP, as well as requirements for record keeping.

2.0 SCHEME DESCRIPTION

2.1 The Scheme

- 2.1.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site Battery Energy Storage System ('BESS') on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation. The Scheme is located in the East of England.
- 2.1.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity to the National Grid, as well as the storage of up to 100 MW of electricity in the BESS.
- 2.1.3 A more detailed description of the Scheme is provided within ***PEIR Volume 1 Chapter 2***.

2.2 The Site

- 2.2.1 The Site is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council and Huntingdonshire District Council. The site location is shown on PEIR ***Volume 3 Figure 1-1***.
- 2.2.2 The Site area extends to approximately 769 hectares (ha) and is hereafter referred to as the 'Scheme Boundary'. The Scheme Boundary includes all land for the solar development, BESS, landscaping, cabling, access and grid connection.
- 2.2.3 With reference to ***PEIR Volume 3 Figure 1-2***, for ease of reference the Scheme Boundary has been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Scheme Boundary also covers land outside of East Park Sites A to D

which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

2.2.4 With reference to **PEIR Volume 3 Figure 1-2**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **PEIR Volume 3 Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and arable fields.

- **Cable Corridor – Site D to Eaton Socon Substation** – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

2.3 Site Context

- 2.3.1 Settlement surrounding the Scheme Boundary comprises a number of villages, including Pertenhall and Great Staughton to the north, Little Staughton and Keysoe to the south, Swineshead to the west, and Hail Weston to the east.
- 2.3.2 Neither the Scheme Boundary nor the immediate surrounding area is covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The closest statutory landscape designation to the Scheme Boundary is the Chilterns National Landscape located approximately 30 km to the south. The Scheme Boundary is also not within any locally designated (non-statutory) landscapes.
- 2.3.3 There are no statutory nature conservation designations within the Scheme Boundary. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. Perry Woods SSSI is located circa 1.8 km north of the Scheme Boundary and Grafham Water SSSI is located circa 2.8 km north. The closest ‘European site’ (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Scheme Boundary, to the north-west.
- 2.3.4 The following non-statutory nature conservation designations are in close proximity to the Site:
- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
 - Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.

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- 2.3.5 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of this environmental assessment of the Scheme has discovered the probable site of a Roman Town in Site C. Due to the likely national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a Scheduled Monument. The application was accepted and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **PEIR Volume 3 Figure 1-3**.
- 2.3.6 There are no other statutory designated heritage assets within the Site. There are a number of listed buildings located within the vicinity of the Site, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. Of particular note this includes the Grade I listed Church of St Peter in Pertenhall; the Grade I listed Church of St Mary the Virgin in Keysoe; the Grade I listed Church of All Saints to the east of Little Staughton; and the Grade I listed Church of St Andrew at Great Staughton. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary.
- 2.3.7 The Site is not covered by any conservation areas, with the closest being the Great Staughton Conservation Area, located circa 200 m north of East Park Site C; Swineshead Conservation Area, located circa 750 m west of East Park Site A; and Riseley Conservation Area, located circa 1.2 km south-west of East Park Site A.

2.3.8 The Site is located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west through Site A, with an unnamed watercourse through Site B, and with the River Kym to the north of Site C.

2.3.9 The Site is crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

2.4 Construction Phasing

2.4.1 The Construction Phase is expected to last between 30-36 months based on experience of constructing other similar-scale installations across Europe. Subject to the Scheme securing a Development Consent Order in Summer 2026 it is anticipated that works would start on Site in Summer 2027 and be completed in late 2029 or early 2030.

2.4.2 The Scheme will be split into a number of construction phases which are illustrated in **PEIR Volume 2 Appendix 2-1**, supported by **PEIR Volume 3 Figure 2-6**. The construction phases would be managed such that they are often happening in tandem in order to build out the Scheme in the most efficient way possible.

2.4.3 The primary construction phases set out in **PEIR Volume 2 Appendix 2-1** are as follows:

i) Enabling Works (Months 1 to 3)

- a. Establishment of Main Construction Compound in Site D;
- b. Establishment of Main Site Access from B645 into Site D to the Main Construction Compound;
- c. Establishment of Access Tracks and Temporary Access Tracks across Sites A, B, C and D;

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- d. Establishment of crossing points over drainage ditches and existing utilities;
 - e. Establishment of soft landscaping in areas of habitat mitigation;
- ii) Construction of the East Park Substation (Months 2 to 12);**
- a. Establishment of internal access roads, fencing and surfacing;
 - b. Establishment of foundations for the Transformers, Control Building and Electrical Equipment;
 - c. Construction of the Control Building;
 - d. Establishment of metallic structures for the Electrical Equipment;
 - e. Installation of the 400 kV transformers;
 - f. Installation of Switchgear, Cabling and other Equipment;
 - g. Establishment of other minor ancillary works
- iii) Construction of the 400 kV Grid Connection (Months 3 to 10);**
- a. Establishment of temporary access road;
- iv) Excavation of trenches;
- a. Excavation for Jointing Chambers;
 - b. Laying of cable conduits in the trenches between Jointing Chambers;
- v) Pouring of concrete around the conduits and backfilling of trenches with soils;
- a. Construction of Jointing Chambers;
 - b. Cable pulling between Jointing Chambers;
 - c. Connecting of cables within Jointing Chambers;
 - d. Establishment of new Generation Bay within the Eaton Socon Substation;
 - e. Testing and commissioning of grid connection;
- vi) Sealing of Jointing Chambers and backfilling of land above Jointing Chambers; and
- vii) Removal of temporary access road and reinstatement of all land.
- viii) Construction of the East Park BESS (Months 7 to 24);**
- a. Establishment of internal access roads, fencing and surfacing;

- b. Establishment of foundations for the Battery Storage Units, Transformers, Control Building; Auxiliary Transformer and Water Storage Tanks;
- c. Establishment of internal cable trenches between equipment;
- d. Installation of cabling;
- e. Delivery and installation of Battery Storage Units, Transformers, Control Building, Auxiliary Transformer and Water Storage Tanks; and
- f. Testing and commissioning of BESS.

ix) Construction of East Park Sites A, B C and D (Months 2 to 30).

- a. Establishment of Satellite Compound;
- b. Establishment of Fencing;
- c. Marking out locations of Solar PV Tables, Transformers, and Trenches;
- d. Excavation of trenches and laying of conduit for cables;
- e. Establishment of surface water drainage infrastructure;
- f. Establishment of foundations for Transformers;
- g. Establishment of Solar PV Mounting Structures;
- h. Installation of Solar PV Modules and Inverters;
- i. Establishment of CCTV and Monitoring Systems;
- j. Installation of Low Voltage Cabling between Solar PV Modules, String Inverters, Transformers and CCTV;
- k. Installation of 33 kV High Voltage Cabling between Transformer and East Park Substation;
- l. Testing and Commissioning; and
- m. Establishment of soft landscaping in areas of habitat mitigation.

2.5 Construction Access, Compounds and Resourcing

Construction Traffic, Plant and Site Access

- 2.5.1 The Main Site Access will be from the B645 into East Park Site D, with all HGVs arriving into the Site from this point, and the majority of daily staff

movements arriving into Site D. A small number of daily staff movements would access Sites A and B without passing through the Main Site Access.

2.5.2 The construction access strategy has been designed to avoid vehicles using the public highway as far as practicable. Once vehicles arrive in Site D from the Main Site Access at the B645, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road. From Site C, access will be taken north-west via an existing HGV access to Great Staughton Road where vehicles will follow the public highway to access Site B, thus avoiding large volumes of traffic passing through Great Staughton. Vehicles would be routed through Site B crossing Little Staughton Road close to Lodge Farm before continuing west towards the B660. At the B660 vehicles would follow the public highway for a short section before accessing Site A using an existing access at Manor Farm.

2.5.3 There are existing access tracks through the Site that will be utilised as far as practicable, as will existing agricultural access points with the public highway. It will be necessary to upgrade or restore sections of the existing access track in order to provide safe and suitable access for vehicles. It is also likely that passing places will need to be established at intermittent positions along these tracks in order to manage vehicle movements during the Construction Phase.

2.5.4 Typical vehicles, plant and machinery that are assumed to be required during the Construction Phase will likely include:

- Articulated Lorry;
- Low Loaders;
- Tipper Truck;
- Concrete Mixer Lorry;
- 40 tonne mobile crane;
- Fuel Tanker;
- Water Tanker;

- Vacuum Tanker;
- Excavators;
- Telehandlers;
- Push press piling rigs;
- Power generators;
- Vibrating rollers;
- Cable pullers;
- HDD Drilling rigs; and
- Skips.

2.5.5 In addition, the following larger vehicles will be required in relation to the delivery of transformers at the East Park Substation:

- 2 no. Abnormal Indivisible Loads (AILs) expected to be up to 200 tonne weight;
- 1 no. 250 tonne mobile crane.

2.5.6 An outline Construction Traffic Management Plan (oCTMP) has been prepared which details the environmental measures which may be implemented in relation to the traffic generated during the construction phase of the Scheme. It has been prepared to ensure that the proposed management and mitigation measures for the safe management and control of construction traffic, including site personnel movements, will minimise the likely effects on existing road users during the construction phase.

2.5.7 The oCTMP forms **PEIR Volume 2 Appendix 9-1** and will be developed further prior to submission of the application for development consent. If the DCO is granted, this oCTMP will be developed into a detailed Construction Traffic Management Plan (CTMP) once a contractor is appointed. The CTMP will be in substantial accordance with the oCTMP, and will be a requirement of the DCO, for submission and approval by the Local Planning Authorities (LPA) prior to construction.

Construction Compounds

- 2.5.8 The Main Construction Compound will be located in Site D close to the Main Site Access from the B645 to the north-east. The Main Construction Compound would comprise offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and unloading area.
- 2.5.9 Satellite Compounds would also be located across Sites A, B and C in relation to the construction phasing of the Solar PV Areas. These compounds would be smaller in footprint than the Main Construction Compound but would still provide offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and unloading area.
- 2.5.10 There would be no construction compounds located along the 400 kV Grid Connection as excavated soils would be stored adjacent to the trench, and materials such as conduit, concrete and cabling would be delivered to the Main Construction Compound and installed along the Grid Connection as and when required.
- 2.5.11 The location of proposed construction compounds is shown on ***PEIR Volume 3 Figure 2-6***.

Construction Staff

- 2.5.12 It is anticipated that the average number of workers on Site across the Construction Phase would be 496, with a peak workforce of 854 in Month 12. The workforce would be distributed across the Site with work happening in parallel across the Substation, BESS, 400 kV Grid Connection, and Solar PV Areas in Sites A, B, C and D.
- 2.5.13 An illustrative workforce resource schedule is presented in ***PEIR Volume 2 Appendix 2-1***.

3.0 ROLES & RESPONSIBILITIES

3.1 Site Team

3.1.1 The following are key Site roles during the Construction Phase that would have responsibility for management of environmental impacts, with responsibilities for each role are also set out (this list is not definitive and additional roles & responsibilities may be added to the final CEMP):

- **Principal Contractor** – This is a formal role established in the Construction (Design and Management) Regulations 2015² (CDM Regulations 2015). The Principal Contractor will be appointed by BSSL Cambsbed 1 Ltd and have responsibility for co-ordinating the Construction Phase of the project.
- **Construction Project Manager** – The Principal Contractor will identify a Construction Project Manager who will have overall responsibility for implementation of the CEMP and all other DCO and legislative requirements.
- **Quality Manager** – The Quality Manager will have responsibility for quality assurance and compliance, document management and record keeping, inspections for quality control, management of risks, and process improvement related to quality control and assurance. For the CEMP they would have responsibility for quality assurance of procedures and for management of documentation, records, and monitoring of the systems relating to the same.
- **Health and Safety Manager** – responsible for the monitoring and control of health and safety, and rules and regulations arising.
- **Environmental Manager** – The Environmental Manager has responsibility for management of environmental matters related to the Construction Phase of the Scheme, including ensuring compliance with legislation, ensuring that mitigation, management and monitoring measures are implemented, and that best practice is applied during works.

The Environmental Manager will be a point of contact with environmental bodies and other third parties as required to perform their duties.

- **Environmental Clerk of Works** – The Environmental Clerk of Works (ECoW) will be a suitably qualified environmental manager responsible for on-site management and monitoring of environmental impacts including for soil management, pollution control, noise and dust monitoring, and surface water.
- **Ecological Clerk of Works** – The Ecological Clerk of Works (EcoCoW) will be a suitably qualified ecologist responsible for on-site managing and monitoring of the works in relation to habitats, protected species, and other wildlife.
- **Archaeological Clerk of Works** – The Archaeological Clerk of Works (ACoW) will be a suitably qualified archaeologist responsible for on-site management and monitoring of the works in relation to archaeology.
- **Flood Warden** – The Flood Warden will be responsible for preparation, management, and response to flood incidents, inclusive of reacting to flood warning and alerts.
- **Community Liaison Officer** – The Community Liaison Officer will ensure that the Community Liaison Group (CLG) is established and will be the point of contact for the CLG, ensuring that regular updates are issued during the construction of the Scheme.

3.1.2 These roles and responsibilities are indicative and will be confirmed in the final CEMP.

3.2 Stakeholders

Community Liaison Group

3.2.1 A Community Liaison Group (CLG) will be formed prior to construction and will continue through until ultimate decommissioning of the Scheme.

3.2.2 During the Construction Phase, the purpose of the CLG will be to allow interested community members and bodies to be regularly updated on

construction progress and activities. Regular meetings will be held with the CLG where the Community Liaison Officer will provide updates on the work, any changes that may occur (e.g. due to unforeseen circumstances), and other useful information (e.g. movement of large loads, upcoming road works etc.). The CLG will allow local residents to raise issues with the Community Liaison Officer and to act as a forum to discuss relevant issues for the construction of the Scheme. Membership will be open to the following non-exhaustive groups:

- Parish Councils;
- Local Residents;
- Local Businesses; and
- Local Community Groups.

Stakeholders

3.2.3 The following stakeholders will be engaged prior to and during construction of the Scheme:

- Bedford Borough Council;
- Huntingdonshire District Council;
- Cambridgeshire County Council;
- Environment Agency;
- Natural England; and
- Historic England.

4.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT

4.1.1 This section of the oCEMP sets out the general principles and control measures that will be employed on Site during the Construction Phase, which are applicable to all aspects of the Scheme.

Construction Hours of Work

4.1.2 Construction operations would be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no construction work on Sundays or Bank Holidays.

4.1.3 These construction hours of work will be observed unless there are exceptional circumstances where the need arises to work outside of them. Where works are to be conducted outside the above hours they will comply with the restrictions stated in the CEMP and any other restrictions agreed with the relevant LPAs.

Site Security

4.1.4 The Site will be secured by temporary fencing (such as Heras fencing) during the Construction Phase, with overall management of security resting with the Principal Contractor. All plant and materials will be secured to prevent theft or vandalism. Remote monitoring and intrusion detection is likely to be managed via the use of deterrent systems such as 'Armadillo' camera security units.

Protection of the Public

4.1.5 In addition to the responsibilities set out under Construction (Design and Management) Regulations 2015, the Principal Contractor will be alert to the risk of works being accessed by unauthorised members of the public and will ensure that site security is maintained at a high standard across the Site to ensure that the risk of access by trespassers is minimised.

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- 4.1.6 A high standard of ‘housekeeping’ will also be maintained across the site to reduce risks to trespassers in the event that they do gain access to the site. Construction compounds and material storage areas will be fully secured within the site, and all materials, equipment, and plant will be fully secured when not in use, and in particular at the end of each working day.
- 4.1.7 Where public rights of way cross the Site or interact with construction access routes they will be suitably managed to protect the public. Management of public rights of way is likely to involve the use of mesh fencing or Heras fencing as appropriate in order to clearly demarcate and separate public rights of way from construction traffic and activities. Where necessary, banksmen would be utilised during construction where construction traffic is required to cross a Public Rights of Way (PRoW).
- 4.1.8 An outline Public Right of Way Management Plan will be prepared submitted with the application for development consent. This document will set out the principles by which PRoW will be managed during the construction, operation and decommissioning phases, with a detailed Public Right of Way Management Plan produced following grant of the DCO and prior to the start of construction.

Signage

- 4.1.9 Health and Safety Signage will be positioned on the Site perimeter and around the construction site guiding traffic and pedestrians, and giving warnings of potential dangers and hazards (e.g. Warning: Construction site, No authorised access, Caution: construction traffic, and public/pedestrian directional signage etc.). Within the Site and at access points signage will be erected setting out required conduct within the site boundaries (e.g. Site Safety conduct signage, PPE instruction signage, Danger: Overhead Wires etc.).

Inductions

- 4.1.10 All site visitors and operatives will be directed in the first instance to East Park Site D where they will be required to sign in and undergo a suitable induction.
- 4.1.11 Inductions will be completed as appropriate for the role and in accordance with best practice approaches prior to commencing work or visiting site. Records of inductions and competencies will be held on site.
- 4.1.12 Risk assessments and methods statements will be produced for all activities and they will be site-specific. Operatives will be briefed on method statements and risk assessments relevant to their work prior to their commencing work. Copies of the risk assessments and method statements will be held on site and will be available for use and inspection.
- 4.1.13 Operatives and visitors will be required to sign in and out every day.

Deliveries

- 4.1.14 Signage will be sited on the local Highway Network and at the Site Entrance to direct all deliveries from the A1 to the main construction compound in Site D. Drivers will be required to report to the Site Office during working hours. When the site is not open for deliveries, delivery vehicles will not be permitted to circulate, queue, or wait on the public highway.
- 4.1.15 HGV deliveries to the Site will be allocated a delivery slot which they will be required to comply with. Delivery slots will be allocated by the Construction Project Manager. A banksman will be made available to assist HGV drivers in accessing the site.

Health & Safety

- 4.1.16 The requirement for comprehensive health and safety assessments are an essential part of the construction process, with the CDM Regulations 2015 setting out requirements & responsibilities. Thus, A CDM Coordinator would be required to be appointed by the Principal Contractor prior to any

construction work commencing, and with health & safety assessments to be produced as part of the Construction Phase Plan required under the CDM Regulations (2015).

- 4.1.17 Weekly meetings will be held between the Principal Contractor, Construction Project Manager, and Health and Safety Manager to review matters related to health & safety. The Health and Safety Manager will ensure that they or a suitably qualified member of their organisation regularly visits the site to monitor health & safety matters. Monitoring reports will be produced and provided after these visits.
- 4.1.18 Reportable accidents and dangerous occurrences will be reported in accordance with RIDDOR³.
- 4.1.19 In line with other requirements in this section, appropriately licenced contractors will be appointed to undertake groundworks, a safe system of working established prior to commencement of works, and Personal Protective Equipment (PPE)/Respiratory Protective Equipment (RPE) suitable for the tasks must be worn by operatives.

Contamination

- 4.1.20 A watching brief shall be maintained for unexpected land contamination. Should any unforeseen gross or widespread contamination be encountered on site then an appropriately qualified contaminated land specialist should be contacted immediately. The specialist will attend the site, examine the potential contaminative materials (including taking samples where required or the material or soil), and provide advice as to required actions (if any). Records will be kept of this investigation, and these will be communicated to the Local Planning Authority (LPA).
- 4.1.21 Should a pollution incident occur, the relevant external organisations would be contacted. The details of those organisations will be provided on the relevant notices, for example with a spill kit, or held by the Project Manager overseeing the work. This could include:

- Environment Agency;
- Police;
- Fire and Rescue Service;
- National Grid;
- Natural England; and
- The Local Planning Authorities of Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council.

4.1.22 All accidents, incidents and near misses (including spills, dust, noise pollution etc.) will be reported to the Site Manager immediately. These will be recorded and investigated as appropriate. Details to be recorded will include: a description of the incident, potential contributory causes, adverse effects, measures implemented to mitigate adverse effects, and effectiveness of measures implemented to prevent incidents happening again.

Unexploded Ordnance

4.1.23 The Phase 1 Geo-Environmental Assessment (***PEIR Volume 2 Appendix 12-1***) has identified the potential for unexploded ordnance (UXO) at the Site. A UXO Management Plan will be a requirement of the DCO to be prepared prior to construction commencing. All works across the Site will be required to accord with the UXO Management Plan, and site-specific UXO Awareness Briefings will be given to all operatives undertaking intrusive works.

4.1.24 In certain areas identified by the UXO Management Plan, an Intrusive Magnetometer Survey of all pile locations and excavations will be undertaken down to the maximum bomb penetration depth.

4.1.25 A UXO Specialist will be available at all times during the Construction Phase to monitor works as required using visual recognition and instrumentation, and respond to reports of suspicious objects.

Welfare Provision

4.1.26 Full welfare facilities will be provided by the Principal Contractor (as required by the CDM Regulations 2015), and these must be in place prior to construction work commencing. The welfare facilities must be placed in convenient locations within the Construction Compound on each site, and as a minimum these will comprise the following: offices, welfare facilities, a toilet block, car parking, and stores. The Main Construction Compound will include additional/larger facilities reflecting its role. The toilet and welfare facilities will store foul/wastewater will then be collected/emptied by specialist licenced contractors.

Lighting

4.1.27 Temporary mobile lighting towers will likely be required during winter months. Lighting will be operated to minimise impacts on human and ecological receptors, and would generally not be operated outside of the specified construction working hours. Lighting will utilise directional fittings to minimise outward light spill and glare.

Utilities

4.1.28 Utilities companies will be engaged with to identify 'utilities infrastructure' (e.g. gas pipelines, water mains, electricity cables etc.) set with or around the site and to agree safe working methods around that infrastructure. This will include agreeing required offsets around that 'utilities infrastructure' where no solar farm infrastructure may be placed, and where set working practises must be followed.

Emergencies

4.1.29 Emergency planning will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency in relation to responding to flood warnings and events.

4.1.30 The CEMP will detail the procedures for responding to incidents and emergencies on site, and any reporting.

4.1.31 A notice displaying emergency contact details will be displayed in a prominent location onsite – such as within the site office. External notices providing emergency contact details will be placed at prominent locations around the perimeter of the site.

Fire Plan / Special Site Instructions

4.1.32 At Site Induction all site personnel must be advised of the firefighting equipment on site and the escape routes & procedures. A Fire Plan will be kept in the site file. Permits for hot working will be issued as required.

4.1.33 A Battery Safety Management Plan for the BESS will be produced and an outline Battery Safety Management Plan will be prepared for submission with the application for development consent. The outline Battery Safety Management Plan will set out measures to ensure the safety of the BESS and procedures to be followed in the event of a fire or other accident.

Certification of Mobile Plant

4.1.34 All plant will have the appropriate certification and checks with copies held on file on site. All plant will be regularly inspected, and records of these inspections will be held on file on site.

Waste management

4.1.35 The Waste Hierarchy must be applied by any person who produces, keeps or manages waste per the duty set out in the Waste (England and Wales) Regulations 2011⁴. The Waste Hierarchy requires any person managing waste to first consider waste prevention, then preparing material for re-use or recycling, and only then use waste recovery methods (i.e. firstly energy recovery) and then waste disposal as the last option. Thus, the waste

hierarchy must be applied when managing the Construction Phase of The Scheme.

4.1.36 Detail of measures to minimise, re-use, and control waste are set out later in this document and will be detailed in a Construction Waste Management Plan (CWMP) to be submitted with the application for development consent. However, briefly, the Principal Contractor will:

- Take all reasonable steps to minimise the volume of waste generated by the Construction Phase of the Scheme (e.g. reduce and re-use);
- Separate main waste streams on the site and segregate them to maximise opportunities of re-use and recycling; and,
- Where waste is to be removed from the site to a waste facility then fully licenced waste carriers will be used and waste will be taken to licenced facilities.

Surface water management

4.1.37 An outline Surface Water Management Plan (oSWMP) has been prepared as **PEIR Volume 2 Appendix 8-2** and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. If the DCO is granted, the oSWMP will be developed into a detailed Surface Water Management Plan (SWMP) once a contractor is appointed. The SWMP will be in substantial accordance with the oSWMP, and will be a requirement of the DCO, for submission and approval by LPAs prior to construction.

Flood risk

4.1.38 Limited sections of the site are subject to fluvial flood risk, with critical infrastructure placed outside of those areas. However, there is some risk of pluvial flooding in parts of the site from surface water and smaller watercourses. The Scheme has been designed to account for those risks (per

PEIR Volume 1 Chapter 8, and the Flood Risk Assessment at ***PEIR Volume 2 Appendix 8-1***).

- 4.1.39 To manage the residual risk of flooding to Site Operatives a Flood Warden will be appointed, who will be familiar with the Site and risk, and will ensure that Operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.

Liaison with Public

- 4.1.40 Neighbouring residents will be actively informed about the progress of works on the Site throughout the duration of the Construction Phase of the Scheme via the Community Liaison Group. Regular communications will be sent to them to provide updates on the work, any changes that may occur (e.g. due unforeseen circumstances, and other useful information (e.g. movement of large roads, establishment of road works etc.)). These will also include details of a contact telephone number and the project website.
- 4.1.41 A contact telephone number will be maintained throughout the duration of works (including an outside of working hours [out of hours] number for use if required) to allow members of the public, local businesses, and other such parties to make enquiries or raise a complaint. The telephone number provided to local residents and businesses will be maintained at all times whilst the development works are taking place in order to respond to any enquiries and complaints.
- 4.1.42 A project website will be maintained throughout the duration of works to allow members of the public, local businesses, and other such parties to view updates on the project, make enquiries or raise a complaint. The project website will be maintained at all times whilst the development works are taking place in order to respond to any enquiries and complaints.
- 4.1.43 A main site display board will be placed in a prominent location at the Site (e.g. at the Main Site Entrance), and regular smaller site boards will be placed at key points on the site boundary. The Main Site Display board shall provide

detail on the works being undertaken and notices/summary information as the current stage of works and upcoming work. All site boards shall include detail of works being undertaken, the contact telephone number (including the out of hours number), the project website and a postal address where enquiries/complaints may be sent.

4.1.44 Any complaints arising from the site during the Construction Phase will be addressed by the Site Manager. A Complaints Register will be maintained, and this will include the following:

- Complainant's details.
- Date and time of the complaint.
- Cause(s) of the complaint.
- Action taken to resolve the complaint, and date and time of the same, or reasons for any unresolved complaints (including where no issue is found).

4.1.45 The Complaints Register will be regularly reviewed as part of monitoring of the CEMP to ensure that it is being followed, that any issues are identified, and to monitor compliance with its Management and Mitigation Measures.

Best practice measures

4.1.46 The Considerate Constructors Scheme (CCS) will be adopted for the Scheme. This standard includes best practice measures that go beyond statutory compliance and thus will further reduce pollution and nuisance from the Scheme.

Monitoring & Implementation Arrangements

4.1.47 The Site Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions noted in this CEMP are undertaken. Detail of general monitoring requirements are set out later in this document.

5.0 ENVIRONMENTAL MITIGATION MEASURES

5.1.1 The following tables set out outline mitigation and management measures that would as a minimum form part of the CEMP. These have been prepared using detail set out in the PEIR of required measures for each topic. These measures would be secured via the requirements of the DCO, and that a final CEMP would be prepared by the Principal Contractor prior to construction commencing.

Table 5.1: Summary of the construction mitigation and management measures – Landscape and visual

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Potential loss of vegetation to make way for construction activities	A pre-commencement survey of vegetation prior to construction should be undertaken to establish the extent to which any vegetation removal may be needed and identify required protection zones.	Appropriate surveys undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.
Damage to trees / vegetation	Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012 ⁵ , and following an Arboricultural survey undertaken to the same standard prior to construction commencing) via construction exclusion zones and tree protective fencing.	
Visibility of construction activities	Sensitive colouring of welfare facilities and temporary office units within site compounds, site to be kept tidy and organised, materials to be delivered on 'as needed' basis to prevent unnecessary stockpiles.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Temporary site lighting during construction required to enable safe working during hours of darkness will be designed as far as reasonably practical so as not to cause a nuisance outside of the Scheme. Standard best practice measures will be employed to minimise light spill, including glare.	

Table 5.2: Summary of the construction mitigation and management measures – Cultural Heritage

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon Scheduled Monuments	<p>The Scheduled Monument adjacent to the southern boundary of Site C will be demarcated on Site and all construction works are excluded from this area.</p> <p>The Scheduled Monument (Roman Small Town at Great Staughton) within Site C will be demarcated on Site and protected during construction, except in so far as the temporary access track that crosses it, and cabling works that will be horizontal directionally drilled beneath the archaeology. The cabling works will be at a depth suitable to avoid impact to the archaeology. The installation of the temporary access track will be undertaken with oversight from the ACoW to ensure suitable installation method that avoids damage to the archaeology. There will be no excavation within areas identified as Scheduled Monuments.</p>	<p>An ACoW will be appointed for the Construction Phase who will review and monitor all works on Site.</p> <p>Monitoring requirements will be set out in the WSI and compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.</p>
Direct impacts to archaeology	<p>The CEMP will include mitigation set out within a Written Scheme of Investigation (WSI) to be provided for the pre-construction archaeological investigation. The ACoW shall oversee the implementation of the WSI prior to construction.</p> <p>Areas of Archaeological Constraint will be identified prior to construction, and in these areas archaeology will be preserved in-situ with provision made for mitigation by design using non-intrusive construction techniques, as illustrated by the example on PEIR Volume 3 Figure 2-3a.</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Indirect impacts to archaeology	<p>A Surface Water Management Plan will be followed (draft outline Surface Water Management Plan is provided at PEIR Volume 2 Appendix 8-2) to ensure there will be no surface water run-off impacts from scour.</p> <p>As there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater that could result in significant effects upon organic archaeological and palaeoenvironmental remains.</p> <p>Best practice pollution control measures as set out in this oCEMP will be employed to avoid potential impacts to archaeology from contamination.</p>	
Impact upon setting of heritage assets set outside of the site	Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oCEMP.	

Table 5.3: Summary of the construction mitigation and management measures – Ecology

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Indirect impacts to off-site habitats, including designated sites for nature conservation</p> <p>Indirect impacts to retained on-site habitats including hedgerows, watercourses and ponds)</p>	<p>Working area to be clearly delineated to prevent accidental encroachment beyond the working area. Sensitive habitats and sites (i.e., designated sites for nature conservation and ancient woodland) to be clearly signed.</p> <p>Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oCEMP.</p> <p>Lighting to be used only where required, and if used to be task specific and directed away from boundary habitats including woodland, hedgerows and watercourses.</p>	<p>An EcoCoW will be appointed for the Construction Phase who will review and monitor all works on Site</p> <p>Log to be kept of all site inductions including on outcomes of pre-construction surveys/checks.</p>

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012,</p> <p>Hedgerows to include a minimum 6m buffer, excluding points of widening, in which no works (other than landscaping) is to occur.</p> <p>Watercourses to include a minimum 8m buffer, excluding crossing points, in which no works (other than landscaping) is to occur.</p>	
Protection of wildlife (general measures)	<p>Trenches to be backfilled or covered overnight, or otherwise fitted with a means of escape to prevent entrapment.</p> <p>Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oCEMP.</p> <p>Lighting to be used only where required, and if used to be task specific and directed away from boundary habitats including woodland, hedgerows and watercourses.</p>	
Damage to birds nests	<p>Vegetation clearance within the nesting bird season (March to August inclusive) to be avoided where reasonably practicable</p> <p>Any vegetation to be cleared during the nesting bird season must first be checked by the EcoCoW. If a nest is located an appropriate buffer zone (species specific) will be enforced</p> <p>Ground cover will be maintained in such a way to discourage skylark nesting prior to commencement of construction (e.g., kept uniformly mown to ground level)</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disturbance of Wildlife and Countryside Act Schedule 1 bird species	A pre-construction survey for schedule 1 birds, with a focus on disturbance sensitive species such as barn owl, will be undertaken prior to work commencing in any new location within the Site.	
Damage or destruction of bat roosts	<p>Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012.</p> <p>Any trees where works are required to be subject to pre-construction survey to assess any bat roost potential and appropriate mitigation measures (e.g., soft fell), further survey and/ or licencing to be undertaken.</p>	
Killing/ injury of amphibians and/ or reptiles	<p>Clearance of suitable terrestrial habitat (e.g., tussocky grassland) to be undertaken following a two stage cut</p> <p>Hedgerow removal to be subject to a hand search by the EcoCoW prior to removal</p> <p>Any suitable refugia (e.g., rubble piles) to be dismantled by hand under the watching brief of the EcoCoW</p> <p>Stored Materials to kept on pallets raised off the ground to discourage use as a refuge</p>	
Damage to water vole burrows	A pre-construction survey for water vole will be undertaken at all locations where ditch/ watercourse crossings are proposed. Where necessary, works will only proceed under an appropriate licence issued by Natural England.	
Disturbance of otter	A pre-construction survey for otter holts will be undertaken prior to work commencing within 200m of a watercourse. Where necessary, works will only proceed under an appropriate licence issued by Natural England.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Damage to badger setts or disturbance of badger using a sett.	<p>Any works within 30m of a badger sett to be undertaken following the watching brief of the EcoCoW.</p> <p>A pre-construction survey for badger will be undertaken prior to work commencing in any new location within the Site to identify any newly excavated badger setts. Where necessary, works will only proceed under an appropriate licence issued by Natural England.</p>	

Table 5.4: Summary of the construction mitigation and management measures – Hydrology and Flood Risk

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Increased sedimentation in runoff from construction earthworks areas and other exposed ground	<p>A minimum buffer distance of 8 m from watercourses, will be observed for all infrastructure. This is with the exception of access tracks, cable crossings and drainage ditches.</p> <p>All reasonably practicable measures will be taken to prevent the mobilisation and deposition of sediment from construction activities to any existing watercourse. In the first instance, any major construction works will be minimised during heavy precipitation events and carried out during dry months where possible.</p> <p>Silt fencing and where appropriate, filter strips will be utilised to trap and filter run-off from excavation works, which includes foundations for the substation and BESS compound, cable trenches and access roads.</p> <p>Silt matting may be placed at the outfall of settlement ponds (where these are utilised) to filter sediment during heavy rainfall events.</p> <p>Check dams would be installed within drainage ditches at regular intervals, where appropriate. Check dams slow the flow of water within watercourses thereby encouraging the settlement of suspended solids. More details on the</p>	<p>Temporary drainage features will be regularly monitored throughout construction. Specific details of this monitoring will be confirmed in detailed CEMP.</p> <p>The silt fencing, filter strips and silt matting would be monitored by the Ecological Clerk of Works and will be replaced whenever necessary.</p> <p>Requirements for a detailed watercourse quality monitoring plan will be agreed with the regulator. This would include details of all baseline, construction phase and post construction (operational phase) monitoring, which will involve both</p>

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>measures above is given in the outline Surface Water Management Plan (<i>PEIR Volume 2 Appendix 8-2</i>).</p> <p>Tracks within the Site and any other hard surfaces would be kept clean, this is to prevent mud and sediment accumulating on these surfaces, which may then mobilise in rainfall events.</p> <p>Any wastewater that is produced during the construction phase from activities such as dewatering, will be disposed of in accordance with relevant legislation and should not be discharged directly to surface or foul drains without appropriate licences in place.</p> <p>As soon as possible after construction, preparation, seeding and protection (where required) will be carried out to encourage revegetation on all bare ground. Bare earth, not stabilised by the presence by vegetation is more vulnerable to erosion.</p>	<p>visual assessments and quality testing.</p>
<p>Chemical and fuel spillages</p>	<p>Equipment and spill kits will be provided to contain and clean up any spills to minimise the risk of pollutants entering watercourses.</p> <p>Where there are instances of either fuel, oil or solvents being stored temporarily on Site, these containers will all be stored within bunded areas and covered where possible, to prevent the accumulation of rainwater and to prevent accidental damage.</p> <p>Additional precautions would be taken during plant operation in any areas where there is storage of fuels or chemicals.</p> <p>A pollution incidence response plan will be produced prior to construction activities commencing and will be reviewed and updated regularly by the Principal Contractor. Training will be provided to site workers as part of induction processes and will be updated as necessary. This plan will contain information relating to the location of spill kits and any sensitive receptors, as well as the</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>procedure for incident response. In the unlikely event of any incident, the Site Manager will be notified and will work to coordinate remedial actions.</p>	
<p>Increased runoff volume during storm events</p>	<p>Temporary storage volumes for surface water run-off from the hardstanding areas will be provided during construction by settlement ponds.</p> <p>Appropriate discharge consents will be obtained prior to commencement of construction activities.</p>	
<p>Foul Drainage</p>	<p>There will be no unapproved discharge of foul drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway. Sewage and foul water will be collected in appropriate collection tanks. Regular collection and disposal of sewage and foul water will be conducted by a licenced company.</p>	
<p>Risk of flooding to Site Operatives</p>	<p>A Flood Warden will be appointed, who will be familiar with the Site and the risk of flooding in the area, and will ensure that Operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.</p>	<p>Monitoring of flood events by Flood Warden and recording of response to these and effectiveness of measures taken.</p>

Table 5.5: Summary of the construction mitigation and management measures – Traffic and Transport

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Increased traffic flows, including HGVs, on the roads leading to the Site.</p> <p>Severance and intimidation associated with increased construction traffic and abnormal loads.</p>	<p>A Construction Traffic Management (CTMP) will be produced prior to the commencement of construction activities. A draft outline CTMP is provided at PEIR Volume 2 Appendix 9-1. This includes details of measures to be implemented to mitigate impacts from increased construction traffic.</p> <p>Construction traffic would be routed through fields via temporary access tracks to avoid passing through villages as far as possible.</p> <p>Construction staff would be encouraged to consider ways of travelling to the Site by means other than individual private car. This would include car sharing where possible, and the provision of staff minibuses to transport workers around the Site.</p>	<p>The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the CTMP.</p>

Table 5.6: Summary of the construction mitigation and management measures – Noise and Vibration

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Impact of noise arising from construction activities at noise sensitive receptors (NSR).</p>	<p>Restriction of construction hours in line with DCO requirements, sensible routing of construction plant to minimise noise, plant regularly maintained, plant fitted with effective silencers/any relevant acoustic hoods, plant switched off when not in use, use of non-tonal 'broadband noise' type reversing alarms, use of boundary hoarding screening when working in close proximity to NSR, maximise distance between NSR and any significant noise source and community relations (providing NSR with clear information about activities taking place and length of time that any peak noise may occur).</p>	<p>Appropriate survey/s undertaken to show compliance with noise threshold guidance, and compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.</p>

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of vibration arising from construction activities at vibration sensitive receptors.	Careful choice of any likely piling rigs to minimise noise and vibration (e.g. non-percussive piling rigs).	

Table 5.7: Summary of the construction mitigation and management measures – Air Quality

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of dust arising from construction activities on the site.	<p>Implementation of Best Practice Measures to control and manage dust emissions. Measures to be derived as recommended for a high-risk site in the Institute of Air Quality Management (IAQM) guidance on the assessment of dust from construction. Hierarchy for mitigation to be prevention, suppression then containment.</p> <p>Measures to include:</p> <ul style="list-style-type: none"> - excavation and earthworks areas to be stripped as required to minimise exposed areas; - minimisation of drop heights during earthworks and material handling activities; - completed earthworks and other exposed areas to be covered with topsoil and re-vegetated as soon as practical to stabilise surfaces; - stockpiles of loose materials to be retained for the shortest time possible and to be clearly delineated; - use of enclosed chutes, conveyors and covered skips; - provision of year-round clean water supply for dust suppression; 	<p>A Dust Management Plan (DMP) would be developed and agreed with appropriate stakeholders and set out in the CEMP.</p> <p>Compliance with measures to be regularly recorded via an appropriate method to be set out in the CEMP.</p> <p>A scheme of quantitative dust monitoring to be developed and agreed with appropriate stakeholders and set out in the CEMP.</p>

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<ul style="list-style-type: none"> - use of water bowsers with suitable spray bars (or similar) on site to dampen down internal haul routes and exposed areas, particularly during prolonged dry weather. 	
	<p>Other measures in relation to internal haulage movements would include:</p> <ul style="list-style-type: none"> - provision of heavy-duty construction matting on internal access roads as set out in the oCTMP; - regular compaction, grading and maintenance of on-site non-metalled internal haulage routes; - regular inspections of the Main Site access, other access points, crossing points and local access points; - provision and enforcement of internal site speed limit; - sheeting of all incoming / outgoing vehicles carrying loose loads; - provision of wheel cleaning facilities at appropriate locations before exit on the public highway as set out in the oCTMP. 	
Impact of gaseous emissions from vehicles accessing the site during construction activities	Measures to be implemented as set out in the oCTMP.	Compliance with measures to be regularly recorded via an appropriate method to be set out in the CEMP.
Impacts of gaseous emissions from use of on-site plant and	Where possible use only of equipment compliant with at least Stage IIIB of the NRMM (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 ⁶ .	Compliance with measures to be regularly recorded via an appropriate method to be set out in the CEMP.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
non-road mobile machinery (NRMM)		

Table 5.8: Summary of the construction mitigation and management measures – Ground conditions

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Encountering unexpected contamination during construction phase	As detailed within 4.1.20. Unexpected contamination protocol to accompany oCEMP which details what to do in the event that potential contamination is encountered within unexpected areas	To be specified within protocol for encountering unexpected contamination.
Encountering UXO	As detailed within 4.1.23 – 4.1.25.	As determined by UXO specialist
Dust, debris and litter generation	Dust suppression during dry and windy conditions, good housekeeping during construction to reduce potential impacts of litter, dust and debris generation.	Compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.
Generation of silty and otherwise contaminated run-off	Provision of silt traps and similar within the vicinity of nearby surface watercourses per SWMP. Implementation of Emergency Pollution Incident Protocol to be included as part as CEMP to include, amongst other information, contact with appropriate regulatory authorities as detailed in 4.1.21.	Routine monitoring / observations of surface watercourses as necessary as part of surface water management plan with daily record keeping. Monitoring may suggest sampling but visual observation may be acceptable.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
		Monitoring and sampling as detailed within Emergency Pollution Incident Protocol to be included as part as CEMP.
Pollution caused from generation of foul sewage within construction compounds	All foul sewage generated from welfare facilities will be collected within a sealed system to be uplifted and tankered for disposal/treatment at a suitably licensed off-site facility at a suitable frequency.	Monitoring and maintenance of sewage storage systems and disposal process as stipulated within the CEMP.
Leaks and spillages of fuel and chemicals required for construction phase	The storage of fuels or chemicals required during the construction phase will be limited to diesel generators to provide power to the compound area and above ground diesel and ad-blue tanks / fuel tankers for re-fuelling Site plant. Such fuel storage would be housed appropriately and banded, refuelling would be limited to designated re-fuelling areas and a suitably stocked spill-kit will be retained within the compound areas as part of a standard construction compound requirement.	Monitoring and maintenance of fuel and chemicals storage as stipulated within the OCEMP.

Table 5.9: Summary of the construction mitigation and management measures – Land and Soils

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts to Soils	<p>Mitigation measures to protect soils during construction will be set out in a Soil Management Plan to be appended to the final CEMP prior to construction.</p> <p>Movement of plant and vehicles around the Site, including use of low-pressure tyres to distribute weight where possible.</p>	Soil handling operations will be recorded and regular monitoring of soil conditions, including compliance with the CEMP, across the Site.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>Management of soil horizons to ensure that topsoils and subsoils are kept separate when excavated, not mixed with other materials, and replaced in a sensitive manner to restore pre-excavation soil horizons and avoid excessive compaction.</p> <p>Avoiding multiple handing of soils, which should be moved directly from areas being excavated or stripped to receptor sites, stockpiles, or reinstatement.</p> <p>Ensuring soils are only handled in appropriate moisture conditions.</p> <p>Recording of soil handing operations and regular monitoring of soil condition across the Site in accordance with the SMP.</p>	

Table 5.10: Summary of the construction mitigation and management measures – Socio economics

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disruption to users of Public Rights of Way	Measures to mitigate the effects of disruption to PRow (including the crossing of National Cycle Network 12 by the Cable Corridor - Site D to Eaton Socon Substation at Bushmead Road) during construction are outlined in Table 5.6 Traffic and Transport	The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the CEMP.
Disruption to local residents, businesses, and community facility use	<p>Measures to mitigate the effects of visual impacts during construction are outlined in Table 5.1: Landscape and visual.</p> <p>Measures to mitigate the effects of traffic during construction are outlined in Table 5.6 Traffic and Transport</p> <p>Measures to mitigate the effects of noise during construction are outlined in Table 5.8 Noise and Vibration</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Measures to mitigate the effects on air quality during construction are outlined in Table 5.10 Air Quality	

Table 5.11: Summary of the construction mitigation and management measures – Climate change

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts on on-site workers	Weather conditions to be monitored, and working practices altered to account for adverse weather conditions including flood risk.	Monitor logging of weather forecasts and distribution to staff/contractors, and reaction to same, as part of CEMP monitoring.
Impacts on on-site workers	Risk Assessment Method Statements to be developed for activities.	Monitor Risk Assessment Compliance and performance as part of CEMP monitoring.
Impacts on on-site workers	Training of staff on health and safety matters and site rules, provision of appropriate PPE.	Monitor compliance of staff/contractors with Health and Safety rules, site rules, and use of PPE as part of CEMP monitoring.
Damage to equipment	Construction materials to be chosen which comply with appropriate safety standards.	Monitor choice/specification of materials and performance of same as part of CEMP monitoring.

Table 5.12: Summary of the construction mitigation and management measures – Waste

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
<p>Impact of waste arising from construction activities on the site.</p>	<p>All reasonable actions will be taken by the contractor to minimise the volume of waste produced as a result of the construction of the Scheme. This can be through reducing consumption, reuse, using resources efficiently, and designing for longevity.</p>	<p>A Construction Waste Management Plan (CWMP) shall be developed and agreed with appropriate stakeholders and set out in the CEMP.</p> <p>Compliance with all measures regularly recorded via an appropriate method to be set in the CEMP and CWMP.</p>
	<p>Implementation of measures to reduce waste through control over materials procurement, to include:-</p> <ul style="list-style-type: none"> - Just-in-time material delivery system to avoid materials being stockpiled, which increases the risk of their damage and disposal as waste. - Attention to material quantity requirements to avoid over-ordering and generation of waste materials due to surplus. 	
	<p>Waste from construction activity (site offices & welfare facilities, maintenance of construction vehicles, packaging from incoming materials, other waste from construction of fencing, access roads and other supporting infrastructure, etc.) to be separated/segregated into main waste streams and stored appropriately prior to collection by an approved waste contractor.</p>	
	<p>Waste to be collected by an approved, licensed third party waste facility for recycling and disposal.</p>	
	<p>Re-use of material & waste arising from site clearance and construction to be secured wherever possible. Where materials excavated on-site are initially unable to meet the re-use criteria, they would either be treated to make them suitable for use or, as a last resort, disposed off-site as waste. Reuse of</p>	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	<p>excavated material within the site, will be undertaken in accordance with the CL:AIRE Definition of Waste: Development Industry Code of Practice⁷.</p> <p>Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier.</p> <p>The volume of waste streams generated by the Scheme to be estimated and monitored, and goals set with regards to the waste produced, re-use and recycling, and off-site disposal.</p>	

6.0 IMPLEMENTATION OF MANAGEMENT PLAN

6.1.1 The CEMP will define all responsibilities roles and actions required for implementation of the measures that are set out in this oCEMP. These will include as a minimum:

- The team roles and responsibilities, and the named individuals fulfilling those roles. An organogram and contact directory will also be included;
- The procedures required for monitoring, inspection and reporting of site operations;
- Document control systems and procedures;
- Detail of the communication strategy (stakeholders and third party);
- Detail of the required training for key personnel on environmental topics relevant to the Scheme and CEMP. This will include detail on toolbox talks and on-site briefings required to ensure that relevant staff and Site Operatives are aware of the requirements for environmental control and procedures for the same, and that they have the required level of knowledge to deliver them;
- Detail of measures to ensure that staff and personnel are advised of changes to circumstances as work progresses on the Scheme; and
- Procedures for environmental emergencies.

7.0 MONITORING AND MAINTENANCE

7.1 Monitoring

- 7.1.1 To ensure and demonstrate compliance with the measures set out in the CEMP, monitoring and reporting will take place throughout the Construction Phase of the Scheme. This process will also include oversight of the resulting reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits to be undertaken will be provided in the CEMP.
- 7.1.2 The Environmental Manager will be present on site throughout the Construction Phase. They will observe site activities and in particular will attend when new activities first occur, to ensure compliance with the CEMP, raise deviations where they occur, and to monitor actions and conditions on the site. They will also undertake regular walkover surveys of the site to monitor compliance with the CEMP. They will also undertake regular inspections as required by the CEMP and overall audits of the CEMP to ensure compliance with its requirements. They will also meet regularly with the Site Manager to discuss the construction programme and any issues arising from that or their inspection/monitoring activities. They will also undertake day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.
- 7.1.3 All activities observed by the Environmental Manager, the results of surveys and inspections undertaken by them, and reports produced by them will be documented and logged.
- 7.1.4 Where complaints are received from members of the public these will be logged by the Site Manager in a record keeping system. These logs will include details of the complaint, and actions arising from the same.
- 7.1.5 Similarly, where matters or complaints are raised by the CLG, these will be logged by the Community Liaison Officer in a record keeping system. These

logs will include details of the matter/complaint, and actions arising from the same.

7.1.6 All complaints will be reviewed by the Site Manager, Community Liaison Officer, and Environmental Manager, and result of the review and any corrective actions taken will be logged. The Complaints Log will be reviewed for signs of wider on-going issues, and where these are identified corrective action will be taken.

7.2 Record keeping

7.2.1 A Quality and Safety Management Systems (QMS) and Environmental Management System (EMS) will be provided by the PC. These will be certified in line with the ISO 14001 standards.

7.2.2 Those systems will ensure that records are kept of monitoring, recording, and implementing of environmental management measures for the Scheme. This is vital to ensuring that the Scheme is delivered with a high standard of environmental control throughout the Construction Phase of the scheme, and that corrective actions are undertaken.

7.2.3 A central record keeping system will be established (by the Project Quality Administrator, or a suitable person with delegated responsibility for the same) which will provide a repository for procedures, checklists, reports and other such measures required for the EMS and QMS. This will include maintaining records of inspections, audits, or other such activity undertaken by internal or external parties undertaking audit of the CEMP and measures therein. These would include the following records as a minimum:-

- Licenses, approvals, and other similar regulatory documentation.
- Environmental surveys.
- Environmental equipment test records.
- The Environmental Action Schedule.
- Records of routine site inspections.

- Details of incidents, breaches of the CEMP, or complaints from third parties, and corrective action taken in respect of the same.

7.2.4 A full review of the CEMP will be undertaken at regular intervals and as required to respond to specific issues that may arise. Where a review identifies an issue that requires additional control measures or mitigation be added to the CEMP, or amendment to existing measure or mitigation, then these changes will be made only after prior agreement from the Local Authorities.

7.2.5 The records held in respect of the CEMP will be made available for the purposes of monitoring compliance with the CEMP where a request is made by a Local Planning Authority, the Environment Agency, Natural England, or Historic England.

8.0 REFERENCES

¹ HMSO (2017). Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/572> [Last Accessed: 17 September 2024]

² HMSO (2015). The Construction (Design and Management) Regulations 2015. Available at: <https://www.legislation.gov.uk/uksi/2015/51> [Last Accessed: 17 September 2024]

³ HMSO (2013). The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. Available at: <https://www.legislation.gov.uk/uksi/2013/1471> [Last Accessed: 17 September 2024]

⁴ HMSO (2011). Waste (England and Wales) Regulations 2011. Available at: <https://www.legislation.gov.uk/uksi/2011/988> [Last Accessed: 17 September 2024]

⁵ BSI Standards Publication (2012). *BS 5837:2012 Trees in relation to design, demolition and construction*. BSI

⁶ HMSO (2018). The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018. Available at: <https://www.legislation.gov.uk/uksi/2018/764> [Last Accessed: 17 September 2024]

⁷ CL:AIRE (March 2011). The Definition of Waste. Development Industry Code of Practice Version 2. Available at: <https://claire.co.uk/projects-and-initiatives/dow-cop/28-framework-and-guidance/111-dow-cop-main-document> [Last Accessed: 17 September 2024]