EAST PARK ENERGY

East Park Energy

EN010141

Outline Construction Environmental Management Plan

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APPENDICES

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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 (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 decommission the Scheme. The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), 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 Environmental Statement (ES), will be delivered during the construction of the Scheme.

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) **[EN010141/DR/7.5]**; and
- Decommissioning phase – **outline Decommissioning Environmental Management Plan** (oDEMP) **[EN010141/DR/7.6]**.

1.1.5 This oCEMP is a control document that will be certified by the Secretary of State as part of the DCO and implemented via Requirement 5 in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. The final CEMP(s) produced for any phase of the Scheme (see paragraph 2.4.5 below for more information) will

be in substantial accordance with this oCEMP, and approved by the relevant local planning authority (LPA) before construction commences.

1.1.6 Nothing in this oCEMP will prevent the modification or omission of the control measures set out in section 4 and 5 where the construction methodology means that the measures can be so modified or omitted. This will be confirmed (including confirming that the absence or change to such control measures will not lead to any materially new or materially different effects than those reported in the ES) at the time of submission of the final CEMP for approval.

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 ES;
- **Implementation of Management Plan –** provides a summary of the key measures that must be within the final CEMP to ensure successful implementation of the final CEMP; and

Monitoring and Maintenance – sets out the procedures for monitoring and ensuring compliance with the CEMP, as well as requirements for record keeping, and making information available to registers and the local planning authority as required.

1.3 Relationship with Other Management Plans

1.3.1 This oCEMP is part of a framework of environmental management documents that will be implemented during the construction phase of the Scheme. The final CEMP will work alongside several other specific management plans, which provide further details on mitigation and management measures.

1.3.2 The following will be developed separately to the final CEMP, pursuant to DCO Requirements:

- **Construction Traffic Management Plan (CTMP)**: This plan will manage the movement of construction traffic by setting out strategies for routing, scheduling, access control, and mitigation measures, minimising disruption to local roads, ensuring safety, and reducing environmental impacts throughout the construction phase of the Scheme.
- **Surface Water Management Plan (SWMP)**: This plan will detail site-wide measures for drainage, rainfall runoff management, including flood risk mitigation and the containment of firewater runoff from the Battery Energy Storage System (BESS).
- **Public Rights of Way Management Plan (PRoWMP)**: This plan will ensure the maintenance of existing PRoWs, the implementation of new permissive paths, and the provision of wayfinding signage to guide public access across the Site.
- **Landscape and Ecology Management Plan (LEMP)**: This plan will set out measures for landscape planting, habitat management, and biodiversity net gain, ensuring that mitigation planting and screening vegetation are effectively maintained.
- **Battery Safety Management Plan (BSMP):** To outline fire safety, containment measures, and emergency response procedures for the

battery energy storage system (BESS). This will be accompanied by an Emergency Response Plan.

- **Soil Management Plan (SMP)**: This plan will ensure the sustainable management of soils and materials by setting out strategies for handling, storage, reuse, and disposal, minimising waste, preventing contamination, and protecting soil health throughout the construction phase of the project.
- **Skills, Supply Chain and Employment Plan (SSCEP)**: This plan will ensure local economic benefits by setting out strategies for local job creation, workforce training, and engagement with regional suppliers throughout the construction, operation, and decommissioning phases of the Scheme.
- **Waste Management Plan:** This document will define the waste streams likely to arise during the construction phase, set out handling and disposal procedures, ensure compliance with legal obligations, and promote waste minimisation and sustainable material use.
- **Archaeological Mitigation Strategy:** This document will present the approach to the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. It sets out how the mitigation measures and monitoring requirements will be implemented during construction and has been prepared with the objective of compliance with relevant legislation and policy.
- **Heritage Enhancement Management Strategy:** This document sets out the measures that will be adopted to increase the ability to understand, appreciate and experience buried heritage assets at the Site.

1.3.3 In addition to the documents identified above, which will be submitted separately from the final CEMP, the following plans referenced in this oCEMP will be prepared and incorporated into the final CEMP, either within its main body or as appendices, as appropriate:

- **Communications Strategy**;
- **Construction Dust Management and Monitoring Plan**;
- **Construction Noise Monitoring Plan**;

- **Ecological Reasonable Avoidance Measures**;
- **Emergency Response Plan**;
- **Environmental Incident Management and Pollution Prevention Plan**;
- **Fish Rescue Plan**;
- **Flood Warning and Evacuation Plan**;
- **Frac-Out Contingency Plan**;
- **Ground Investigation Report**;
- **Invasive Non-Native Species Management Plan**;
- **Lighting Strategy**;
- **Peat Management Plan**;
- **Supply Chain Carbon Reduction Plan**;
- **Unexpected Contamination Protocol**;
- **Unexploded Ordnance Management Plan**; and
- **Watercourse and Groundwater Quality Monitoring Plan**.

1.3.4 The purpose of each of these documents is set out in **Appendix C** to this oCEMP.

1.3.5 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly (as a minimum annually) by the Construction Project Manager, Environmental Manager, and relevant regulatory and local planning authorities. Monitoring results will be documented as part of the compliance framework for the construction phase.

1.3.6 If the DCO is granted, each of the above plans submitted with the Application will be developed into a final document once a contractor is appointed, with approval by the relevant LPA prior to construction (following consultation with relevant bodies on each plan as set out in the DCO).

1.3.7 The final CEMP and the associated management plans will be reviewed and updated periodically (as a minimum annually) to ensure continued compliance with regulatory requirements and best practice standards.

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.

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 **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].**

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 **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**.

2.2.2 The Site area extends to approximately 773 hectares (ha) . The Site includes all land for the solar development, BESS, landscaping, cabling, access and grid connection.

2.2.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have 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 Order Limits also cover 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, and from Little Staughton Road to the north-west.
- **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 **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, 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 **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 an arable field.
- **Grid Connection** – 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 The Site is located on the south side of a broad shallow clay vale landform formed by a number of west-east tributaries to the River Great Ouse, which flows north-south to the east of the Site through the town of St Neots approximately 3.7km east of Site D.

2.3.2 The local landscape is generally more undulating than the Site which is located predominantly in a low-lying area with relatively limited topographic variation. The landform rises to the north of the Site towards Grafham Water, to the west of the Site towards a ridgeline beyond Swineshead, and to the south of the Site towards a high point around the Bedford Aerodrome.

2.3.3 The landscape pattern of the local area is broadly consistent, comprising medium- to large-scale arable farmland interspersed with blocks of woodland, particularly in the more elevated parts of the landscape to the north of the Site.

2.3.4 The local settlement pattern is dispersed and typically rural in character comprising occasional distinct village settlements. From west to east the principal settlements in closest proximity to the Site are Swineshead, Pertenhall, Keysoe, Keysoe Row, Little Staughton, Great Staughton, Hail Weston, and Duloe. The town of St Neots lies east of the A1 to the east of the Site and is the largest settlement local to the Site. Outside of the settlements there are occasional individual properties and farmsteads including some in close proximity to the Site. The following properties lie 'inset' within the Order Limits, in that they are excluded from the Order Limits but surrounded by the Site:

- Lodge Farm, a residential property with associated equestrian land uses inset within Site B to the north-west of Little Staughton; and
- The Kangaroo, a former public house which is now a residential property and dog kennels inset within Site B at the junction between Little Staughton Road and Staughton Road.

2.3.5 Neither the Order Limits nor the surrounding area are covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The Order Limits are also not within any locally designated (non-statutory) landscapes.

2.3.6 There are no statutory nature conservation designations within the Order Limits. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. The closest 'European site' (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Order Limits, to the north-west. Further detail on nature conservation designations is set out within **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**.

2.3.7 The following non-statutory nature conservation designations are adjacent 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.

2.3.8 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 the environmental assessment of the Scheme has discovered the site of a Roman Town in Site C. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply 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 **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

2.3.9 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe,

Swineshead, Little Staughton, Great Staughton and Duloe. 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. The Order Limits are not covered by any conservation areas.

2.3.10 The Order Limits are 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.

2.3.11 The Order Limits are 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 for approximately 30 months, based on experience of constructing other similar-scale installations. The ES has assessed a 30-month construction programme to provide a coherent and consistent construction scenario across all ES technical disciplines, including the assumed sequencing, concurrency and intensity of construction activities. The 30-month programme is therefore the reference construction programme for the purposes of the final CEMP(s), unless a revised programme is demonstrated to remain within the construction assessment envelope assessed in the ES in accordance with paragraphs 2.4.6 to 2.4.10 below. Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030).

2.4.2 The Scheme will likely be split into a number of construction phases which are illustrated indicatively in **ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2]**. These 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. The final construction phasing will be approved by the relevant local planning authorities in accordance with Requirement 2 of the **draft DCO [EN010141/DR/3.1]**.

2.4.3 The primary construction stages for the Scheme are set out below. The activities within each key phase are described in an approximate sequential order. However, many of the activities would occur in parallel due to the scale of the project, as illustrated in **ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2].**

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;
d. Establishment of crossing points over drainage ditches and existing utilities; and
e. Establishment of satellite compounds in Sites A, B and C.

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. Delivery and 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 construction phase access road and crossings;
b. Excavation of trench in sections;
c. Excavation and construction of cable jointing chambers in sections;
d. Laying of cable conduits in the trenches between cable jointing chambers;
e. Pouring of concrete around the conduits and backfilling of trench with soils;
f. Cable pulling between cable jointing chambers;
g. Connecting of cables within cable jointing chambers;
h. Establishment of new generation bay within the Eaton Socon Substation;
i. Testing and commissioning of grid connection;
j. Sealing of cable jointing chambers and backfilling of land above cable jointing chambers; and
k. Removal of construction phase access road and reinstatement of all land.

iv) 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.

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

a. Establishment of fencing;
b. Marking out locations of solar PV tables, solar transformers, and trenches;
c. Excavation of trenches and laying of conduit for cables;
d. Establishment of surface water drainage infrastructure;

e. Establishment of foundations for solar transformers (and centralised inverters if used);
f. Establishment of solar PV mounting structures;
g. Installation of solar PV modules, inverters, and transformers;
h. Establishment of CCTV and monitoring systems;
i. Construction of storage, operations and maintenance building;
j. Installation of low voltage cabling between solar PV modules, string inverters, transformers and CCTV;
k. Installation of 33 kV high voltage cabling between solar transformers and East Park Substation;
l. Testing and commissioning; and
m. Establishment of soft landscaping in areas of habitat mitigation.

2.4.4 Following completion of the relevant construction works or construction phase, all construction phase access tracks and any associated construction phase crossings over watercourses or drainage ditches will be removed as soon as reasonably practicable. The affected land, watercourse banks and drainage ditches will be reinstated in accordance with the final CEMP and, where relevant, the final Surface Water Management Plan and final Soil Management Plan.

2.4.5 There could be multiple CEMPs prepared in substantial accordance with this oCEMP to be developed for the phases set out above. Such CEMPs will provide for co-ordination between contractors for the different phases. References to ‘the CEMP’ or ‘the final CEMP’ in this outline CEMP should therefore be taken to include any individual CEMP that may be prepared.

2.4.6 Each final CEMP must include a construction programme for the phase or phases of construction to which that CEMP relates. Where more than one CEMP is prepared, each CEMP must also explain how the programme for that phase interfaces with the wider construction programme for the Scheme, including any other phases being undertaken concurrently.

2.4.7 The construction programme submitted with the final CEMP must identify, as a minimum:

- the anticipated start and completion dates for the relevant phase or phases of construction;
- the anticipated duration of the principal construction activities;
- the extent to which construction activities are expected to occur concurrently;
- the anticipated peak construction workforce and peak construction vehicle movements for the relevant phase or phases;
- any relevant seasonal, ecological, archaeological, hydrological, soil handling, traffic, PRoW or other environmental constraints that influence the timing or sequencing of works;
- the timing for the implementation of relevant mitigation, monitoring and reinstatement measures; and
- the relationship between the construction programme and any other associated management plans.

2.4.8 The construction programme submitted with the final CEMP must be prepared on the basis that construction of the Scheme will be undertaken within the 30-month construction programme assessed in the ES, unless a further environmental assessment is submitted as part of the final CEMP and approved by the relevant LPA.

2.4.9 The further environmental assessment must be prepared where:

- the final CEMP proposes a construction programme that would exceed the 30-month construction programme assessed in the ES; or
- following approval of a final CEMP, the Construction Project Manager or Environmental Manager identifies that the approved construction programme is forecast to exceed the 30-month construction programme assessed in the ES.

2.4.10 The further environmental assessment must demonstrate that the revised construction programme would remain within the construction assessment envelope assessed in the ES and would not give rise to any materially new or materially different environmental effects from those reported in the ES. Where the further environmental assessment identifies that additional, amended or extended mitigation or monitoring is required, the relevant final CEMP and, where necessary, any associated management plan must be updated accordingly.

Site Preparation Works

2.4.11 There are a range of preliminary works that are required to enable the main construction works to commence on the various phases of construction set out above. These enabling works include the initial mobilisation and access to the Site, and individual enabling works for specific phases of the development.

2.4.12 Within the **draft DCO [EN010141/DR/3.1]** these works are identified as the "site preparation works" which would not constitute a commencement of the construction phase. The site preparation works would include the following activities:

- environmental surveys, geotechnical surveys, intrusive archaeological surveys and other investigations required in advance of construction;
- receipt and erection of construction plant and equipment;
- above ground site preparation for construction phase facilities for the use of contractors;
- diversion and laying of apparatus;
- the provision of temporary (construction phase) means of enclosure and site security for construction;
- the temporary (construction phase) display of site notices or advertisements;
- preliminary site access works; and

- site clearance (including vegetation removal, demolition of existing structures or buildings).

2.4.13 The Applicant has thoroughly evaluated the site preparation works and, following assessments within the EIA process, concluded that the environmental impact of these activities does not necessitate the mitigation outlined in the Requirements set out in Schedule 2 of the **draft DCO [EN010141/DR/3.1]** to be in place before they can proceed.

2.4.14 Notwithstanding the above, the Applicant has identified some Requirements deemed necessary to have been discharged for certain site preparation works to commence, and this is accounted for in the drafting of the DCO Requirements. The Applicant has also outlined best practice measures to be adopted when undertaking the site preparation works, aimed at reducing potential adverse impacts on environmental receptors. These measures are detailed in **ES Vol 2 Appendix 2-3: Site Preparation Works [EN010141/DR/6.2]**. Compliance with the measures in this appendix is secured by a Requirement in the **draft DCO [EN010141/DR/3.1]**.

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 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 may 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 (construction phase) 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 a new access track to 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 from 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 temporary (construction phase) 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 It is assumed that there would be an average of 8 one-way HGV movements per day across the 30 month construction phase, with a peak of 30 one-way daily movements during the enabling works in Months 1 to 3. It is assumed there would be an average of 248 one-way daily staff movements across the 30 month construction phase, with a peak of 427 one-way daily staff movements in Month 12. Further details of traffic movements are provided within the **ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1]** and the **ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2]**.

2.5.5 Typical vehicles, plant and machinery that are assumed to be required during the construction phase will likely include:

- Articulated Lorries;
- Low Loaders;
- Tipper Trucks;
- Concrete Mixer Lorries;
- Mobile cranes;
- Fuel Tankers;
- Water Tankers;
- Vacuum Tankers;

- Excavators;
- Telehandlers;
- Push press piling rigs;
- Power generators;
- Vibrating rollers;
- Cable pullers;
- Horizontal Directional Drill rigs; and
- Skips.

2.5.6 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.

2.5.7 An **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]** is provided with the DCO application. The oCTMP sets out the measures used to minimise the impact of construction traffic on local communities by defining the routes that construction traffic must take, any timing restrictions in relation to the use of certain routes, and the penalties to contractors if the oCTMP is not adhered to. A final Construction Traffic Management Plan (CTMP) is secured by Requirement 5 of the **draft DCO [EN010141/DR/3.1]** and requires approval by the relevant planning authority 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 will comprise offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and unloading area.

2.5.9 Satellite compounds will also be located across Sites A, B and C in relation to the construction phasing of the solar PV areas. These compounds will be

smaller in footprint than the main construction compound but will still provide offices and welfare facilities, car parking, materials and equipment storage area, and vehicle manoeuvring and unloading area.

2.5.10 There will be no dedicated 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. Temporary (construction phase) laydown areas formed of heavy duty construction matting would be located intermittently along the grid connection to support the works as required, but these would only be for the temporary (construction phase) storage of materials, or to facilitate trenchless crossings.

2.5.11 Utility supplies will be taken from temporary (construction phase) facilities such as the use of generators, water bowsers, local wastewater storage and transport of waste to an approved off-site disposal facility.

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 indicative workforce resource schedule is presented in **ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2]**.

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 also set out (this list is not definitive and additional roles & responsibilities shall be added to the final CEMP):

- **Principal Contractor** – This is a formal role established in the Construction (Design and Management) Regulations 2015 (CDM Regulations 2015). The Principal Contractor will be appointed by BSSL Cambsbed 1 Ltd and will 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 warnings 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 As a minimum the above roles are likely to be required to support implementation of the CEMP. The requirement for additional roles and details of responsibilities will be confirmed in the final CEMP.

3.2 Stakeholders

Community Liaison Group

3.2.1 A CLG will be formed prior to construction. 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 Businesses; and
- Local Community Groups.

Stakeholders

3.2.2 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 generally be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no construction work on Sundays, public holidays or bank holidays. Construction workers would typically arrive in the hour prior to the start of construction and leave in the hour after construction work ceases. Construction staff would therefore arrive at the Site before 08:00 and depart after 18:00 during weekdays.

4.1.3 There may be instances where operations are required outside the above times e.g. delivery of abnormal loads, fit out of internal equipment within the substations, other quiet non-intrusive works such as electrical testing, commissioning and inspection. In such instances, it will be necessary to agree on a modification to the working hours with the relevant LPA.

Site Security

4.1.4 The Site will be secured by temporary (construction phase) 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 will be managed via the use of deterrent systems, such as 'Armadillo'[1] camera security units.

[1] *'Armadillo' camera security units are rapid-deployment, self-contained CCTV towers, typically with mast-mounted cameras, motion detection, onboard recording, and audio deterrents, used to monitor and deter intrusions.*

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 manage 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.

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 PRoWs within the Order Limits will remain open during the construction phase where it is safe to do so. Where construction activities could affect the safety of PRoW users, access will be managed through measures including managed crossings or short temporary (construction phase) closures with appropriate diversion routes. An **outline Public Rights of Way Management Plan (oPRoWMP) [EN010141/DR/7.8]** has been prepared which sets out the principles by which PRoWs will be managed. Before construction can commence, a final PRoWMP, in substantial accordance with the oPRoWMP, will be submitted to and approved in writing by the relevant planning authority, in consultation with the relevant highway authority, and will be implemented as approved..

Signage

4.1.8 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 from the public highway, 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

4.1.9 All site visitors and operatives will be directed in the first instance to the main construction compound in East Park Site D where they will be required to sign in and undergo a suitable induction.

4.1.10 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.

4.1.11 Risk assessments and methods statements will be produced for all activities and they will be site-specific. Site 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.

4.1.12 Site operatives and visitors will be required to sign in and out every day.

Deliveries

4.1.13 Signage will be sited on the local highway network and at the main 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.

4.1.14 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 and in accordance with the approved CTMP. A banksman will be made available to assist HGV drivers in accessing the site.

Health & Safety

4.1.15 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).

4.1.16 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.

4.1.17 Reportable accidents and dangerous occurrences will be reported in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (as amended) (RIDDOR).

4.1.18 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 and Pollution

4.1.19 A watching brief shall be maintained and documented for unexpected land contamination in accordance with an agreed Unexpected Contamination Protocol which will be prepared as part of, or to accompany the final CEMP. Should any unforeseen gross or widespread contamination be encountered then works will stop in the identifiable bounds of the affected area and an appropriately qualified contaminated land specialist would 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 relevant LPA.

4.1.20 An Environmental Incident Management and Pollution Prevention Plan (EIMP) will be prepared as part of, or to accompany, the final CEMP. Should a pollution incident occur, the incident would be managed in accordance with the EIMP, and where necessary, the relevant external organisations will 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 will include:

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

4.1.21 All accidents, environmental incidents and near misses, including spills and uncontrolled dust or noise emissions, will be reported immediately to the Construction Project Manager, who will ensure that the Health and Safety Manager, Environmental Manager and any relevant external organisation are notified where required. Each event will be recorded and investigated to a level proportionate to its nature and potential consequences. The record will include the date, time and location of the event; a description of the event and its actual or potential adverse effects; the immediate response and any external notifications; the identified cause and contributory factors; and the corrective and preventive actions required. Each action will be assigned to a responsible person, given a target completion date and tracked through to completion, with its effectiveness recorded.

Concrete and Cement-Based Materials

4.1.22 The final CEMP will confirm the detailed construction methodology for each concrete element, including (where relevant) whether elements are to be cast in situ or delivered as pre-fabricated / pre-cast components.

4.1.23 Concrete and other cement-based materials can present a risk to surface water and groundwater quality, including through release of wash water and mobilisation in rainfall run-off. Controls for concrete will be secured through the final CEMP and the associated Environmental Incident Management and Pollution Prevention Plan (EIMP), which will be prepared as part of, or to accompany, the final CEMP.

4.1.24 Concrete batching and any onsite washout will occur only in designated areas, which will be lined to prevent infiltration of high alkaline content flow and will be covered to minimise the ingress of rainwater to the containment areas, as set out in the oSWMP. Where cleaning of vehicles, plant machinery or equipment is required, this will be undertaken at designated washout areas located within a controlled area of the Site to be confirmed as part of the final CEMP. There will be no unapproved discharge of foul or contaminated drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway.

4.1.25 Where concrete works are to be undertaken in-situ, these works will be planned to minimise undertaking such activities during heavy precipitation events and, where possible, to be carried out during dry months, consistent with the construction water quality measures set out in paragraph the oSWMP and Table 5.4 of this oCEMP. Temporary (construction phase) bunding and sediment controls (including silt fencing and filter strips) will be provided where required to reduce the risk of polluted run-off entering the natural drainage system.

Unexploded Ordnance

4.1.26 **ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]** has identified the potential for unexploded ordnance (UXO) at the Site. A UXO Management Plan will be prepared as part of, or to accompany, the final CEMP. 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.

4.1.27 In 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.

4.1.28 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

4.1.29 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

4.1.30 Lighting during construction will need to be sufficient to satisfy health and safety requirements, whilst ensuring impacts on the surrounding environment, including from sky glow, glare and light spillage, are minimised.

4.1.31 Artificial lighting will only be used during the hours of darkness, low levels of natural light or during specific construction tasks to ensure the health, safety and welfare of those on site, including construction staff and visitors.

4.1.32 Appropriate lighting will be installed and operated to ensure that:

- access/egress points are clearly visible during operational hours;
- staff and visitors can move safely around the Site;
- site security can be monitored and maintained;
- sufficient area lighting is provided for the Site office and laydown areas; and
- impacts on ecological receptors, nearby residents and amenity users of the Site are minimised.

4.1.33 Sensitive ecological receptors upon which lighting control measures will be implemented include:

- Non-statutory designated sites for nature conservation, including Huntingdon Wood County Wildlife Site (CWS) and Kangaroo Meadows CWS;
- Field boundary features including hedgerows, trees, woodland, ditches and watercourses;
- Retained individual trees;
- Ponds; and
- Badger setts.

4.1.34 Additional sensitive ecological receptors will also be identified through pre-construction surveys, which will include for Schedule 1[2] bird species, such as barn owl nesting and/ or roosting locations if present.

4.1.35 Lighting towers will be required during the winter months at each of the construction compounds. There may also be a requirement for mobile task lighting at some of the construction locations. Lighting will not be operated for

[2] *Wildlife and Countryside Act 1981*

longer than one hour either side of the specified construction working hours. Lighting will utilise directional fittings to minimise outward light spill and glare.

4.1.36 Lux plans will be provided to demonstrate light spill, clearly showing 0.2, 0.5, 1, 5, and 10 lux. The final lighting strategy will be approved by the relevant local planning authorities as part of the final CEMP.

Utilities

4.1.37 A number of utilities cross the Site, these are illustrated on **ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3]**.

4.1.38 Specific safeguards to protect assets will be adopted during construction works. Working methods will be agreed with the utility undertakers and adopted within agreed construction method statements. Protective Provisions to safeguard utilities crossing the Site are included within the **draft DCO [EN010141/DR/3.1]** to secure this.

Emergencies, Fire Plan, and Special Site Instructions

4.1.39 Emergency planning will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire and rescue service and East of England Ambulance Service, as well as the Environment Agency in relation to responding to flood warnings and events.

4.1.40 An Emergency Response Plan will detail the procedures for responding to incidents and emergencies on site, and any reporting. The Emergency Response Plan must be shared with the appropriate emergency services prior to the start of construction, and any subsequent revisions to the plan should be shared promptly with emergency services.

4.1.41 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.

4.1.42 During site induction, all personnel must be advised of the firefighting equipment on site and the escape routes and procedures.

Certification of Mobile Plant

4.1.43 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

4.1.44 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 2011. 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.

4.1.45 Detail of measures to minimise, re-use, and control waste are set out in the **outline Waste Management Plan (oWMP) [EN010141/DR/7.12]**. A final Waste Management Plan will be prepared in substantial accordance with the oWMP must be prepared and approved by the relevant local planning authorities prior to each phase of the authorised development.

Surface water management

4.1.46 An **outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]** has been submitted with the application, which 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 final SWMP once a contractor is appointed.

Flood risk

4.1.47 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 as set out in **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]** and the Flood Risk Assessment at **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**.

4.1.48 To manage the residual risk of flooding to site operatives a Flood Warning and Evacuation Plan will be developed and a Flood Warden will be appointed, who will be familiar with the Site, 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. The Flood Warden will liaise with the Environment Agency to receive appropriate flood warnings in advance of any potential flood event.

Liaison with Public

4.1.49 Neighbouring residents will be informed about the progress of works on the Site throughout the duration of the construction phase via the Community Liaison Group. Regular communications will be sent to them to provide updates on the work, any changes that occur (e.g. due to 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.

4.1.50 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 construction works are taking place in order to respond to any enquiries and complaints.

4.1.51 A project website will be maintained throughout the duration of the construction phase 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.

4.1.52 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 can be sent.

4.1.53 Any enquiries or complaints arising during the construction phase will be addressed by the Construction Project 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).

4.1.54 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. It will also be made available to the relevant LPA to inspect on request.

Best practice measures

4.1.55 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

4.1.56 The Construction Project Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions noted in the final 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 the details set out in the ES of required measures for each topic. These measures would be secured in the final CEMP which would be prepared by the Principal Contractor prior to construction commencing, which is secured as a Requirement of the DCO.

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
Loss of vegetation to make way for construction activities	A pre-commencement survey of vegetation prior to construction should be undertaken to establish any necessary vegetation removal and identify required protection zones.	Any clearance outside the approved area will result in work stopping in the affected area and the Arboriculturalist or EcoCoW identifying and recording the required remedial action.
Damage to trees / vegetation	Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012[1], **ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [EN010141/DR/6.2]**, and the approved LEMP) via construction exclusion zones and tree protective fencing. Where works under any proposed phase include construction within the RPA of a tree, a specific Arboricultural Method Statement for the work will be prepared and approved in accordance with the LEMP for that phase of the works. Use of trenchless techniques (Horizontal Drilling or Horizontal Directional Drilling (HDD)) will be adopted along the cable route at the location of certain sensitive landscape elements as set out in Tables 2-18 and 2-21 of **ES Vol 1 Chapter 2**	Tree-protection fencing and construction exclusion zones will be inspected by the Arboriculturalist before adjacent work begins, during weekly inspections while that work continues, and following any impact, breach or severe weather event that could have affected them. Work within a root protection area will be supervised at the stages identified in the relevant Arboricultural Method Statement.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	[EN010141/DR/6.1], or as approved as part of the detailed design or an Arboricultural Method Statement approved as part of the LEMP.	Monitoring in accordance with the requirements of the approved LEMP.
Visibility of construction activities	Welfare facilities and temporary office units will use recessive colours, construction compounds will be kept tidy and organised, and materials will be delivered as required to avoid unnecessary stockpiles. Temporary lighting required for safe working during hours of darkness will be positioned, directed and operated to minimise light spill, glare and nuisance outside the Site Upon completion of construction works in each phase or sub-phase (as set out in the **draft DCO [EN010153/DR/3.1]**, the Principal Contractor will promptly remove all temporary (construction phase) stockpiles, plant and machinery, signage, or other equipment, and will ensure the site is in a neat, safe, and tidy condition.	Construction compounds, storage areas and visible stockpiles will be inspected weekly. Unnecessary stockpiles, litter or poorly arranged storage will be rectified promptly. The position and direction of temporary lighting will be checked before first use and following any repositioning or complaint.
Disturbance to soils / drainage from cable construction	Following completion of construction operations for cable construction, agricultural land will be restored to its previous condition in accordance with the SMP. Topsoil will be prepared and seeded with the approved seed mix or returned to arable cultivation, as applicable. Land drains within agricultural land on the cable route, which may be temporarily affected by construction operations, will be restored following completion of the relevant works.	Monitoring in accordance with the approved SMP.
Disruption to users of Public Rights of Way	The measures in Table 5.5 and the approved PRoWMP will apply.	-

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

Potential Impact being managed / mitigated	Mitigation and/or management measures to be implemented	Requirement for monitoring
Direct impacts to archaeology	In accordance with Requirement 15 of the draft DCO, an Archaeological Mitigation Strategy (AMS) is to be prepared, which must be in substantial accordance with the **outline Archaeological Mitigation Strategy [EN010141/DR/7.15]**. The final AMS will identify Areas of Archaeological Constraint (AAC) prior to construction based on further archaeological investigations to be undertaken in accordance with an approved WSI. In these areas archaeology will be preserved in-situ with provision made for mitigation by design using non-intrusive construction techniques, such as: • The use of non-intrusive surface-mounted pre-cast concrete ground anchors. • The use of surface-mounted or array-mounted cable trunking rather than trenching; • Use of surface matting in areas where temporary (construction phase) access tracks are required. • Use of sub-surface horizontal directional drilling where cabling could impact AAC. Where required as part of the approved AMS it may also be necessary to undertake: • Strip, Map and Sample; • Open Area Excavation; and • Archaeological Monitoring. The final methodologies that will be adopted to implement the above archaeological mitigation measures will be set out in the final AMS.	An ACoW will be appointed for the construction phase who will review and monitor all works on Site. Before groundworks begin in an Area of Archaeological Constraint, the ACoW will confirm that the area has been correctly marked and that the approved construction method is being used. Archaeological attendance, findings, notifications, variations and completed mitigation will be recorded in accordance with the final AMS and relevant Written Scheme of Investigation. Monitoring requirements will be as set out in the approved WSI, AMS, SWMP, and the Frac-Out Contingency Plan

Potential Impact being managed / mitigated	Mitigation and/or management measures to be implemented	Requirement for monitoring
Impact upon Scheduled Monuments	The scheduled monument within Site C will be seeded with grassland in accordance with the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** prior to establishment of the temporary (construction phase) access track across the monument. The scheduled monument within Site C will be demarcated on-site, and all construction activities are to be excluded from this area, except for the temporary (construction phase) access track that crosses it and cabling works that will be horizontally directionally drilled (HDD) underneath the archaeology. There will be no surface excavation within the boundary of the scheduled monument. The design and implementation of the temporary (construction phase) access track should be in accordance with the final Archaeological Mitigation Strategy. The HDD bore will be drilled at a minimum depth of 10m below ground level within the boundary of the scheduled monument to avoid and provide a suitable offset to the archaeological remains above. The temporary compounds required for the entry and exit pits of the HDD bore shall be located outside the scheduled monument, with locations to be set out and agreed as part of the approved AMS. The use of bentonite as a lubricant for the HDD bore will be carefully controlled to avoid a breakout and/or spillage from tanks and plant at the drive shaft. A Frac-Out Contingency Plan will be provided by the Principal Contractor in advance of the work starting. The installation of the temporary (construction phase) access track will be undertaken in accordance with the approved AMS, with oversight from the ACoW to ensure the track is installed correctly. The temporary (construction phase) access track across the scheduled monument must be removed in accordance with the final AMS prior to the date of final commissioning of the final phase of the construction period.	

Potential Impact being managed / mitigated	Mitigation and/or management measures to be implemented	Requirement for monitoring
Indirect impacts to archaeology	A final Surface Water Management Plan will be prepared pursuant to Requirement 14 of the draft DCO to ensure measures are in place to reduce the potential for scour and erosion related to surface water run-off. Pollution-prevention measures in Tables 5.4 and 5.8 will be implemented to avoid contamination of archaeological and palaeoenvironmental remains. If horizontal direction drill (HDD) is proposed beneath areas of archaeology constraint then the use of bentonite will be carefully controlled to avoid a breakout and/or spillage from tanks and plant at the drive shaft. A 'Frac-Out Contingency Plan' will be provided by the Principal Contractor for approval by the relevant local planning authority in advance of the work starting. Bentonite will be recycled during the HDD process and will be disposed of as a controlled waste during and following the completion of drilling activities. Appropriately bunded storage containers will be provided at both HDD launch and reception sites to contain any bentonite slurry arisings.	
Impact upon setting of heritage assets set outside of the site	Noise, lighting, vibration and vehicle movements will be controlled in accordance with Tables 5.5, 5.6 and 5.7	

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
Indirect impacts to off-site habitats, including designated sites for nature conservation Indirect impacts to retained on-site habitats including hedgerows, watercourses and ponds)	Working areas will be clearly delineated to prevent accidental encroachment beyond the working area. Sensitive habitats and sites (e.g. designated sites for nature conservation including County Wildlife Sites, and ancient woodland) will be clearly signed to avoid accidental incursion. Fencing would be erected to demarcate the working area in order to protect sensitive ecological or hydrological features during all elements of the construction stages of the project. Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oCEMP. Lighting will only be used where required and will be directed away from woodland, hedgerows, ponds, watercourses and other sensitive habitats. Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012[2], **ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [EN010141/DR/6.2]**, and the approved LEMP) via construction exclusion zones and tree protective fencing Where works under any proposed phase include construction within the RPA of a tree, a specific Arboricultural Method Statement for the work will be prepared and approved in accordance with the LEMP for that phase of the works. Hedgerows to include a minimum 6m buffer, excluding points of widening or crossing points, in which no works (other than landscaping) are to occur. Watercourses to include a minimum 10m buffer from bank top, excluding crossing points, in which no works (other than landscaping) are to occur.	The EcoCoW will review and monitor activities with the potential to affect habitats, protected species or other wildlife. The EcoCoW or ECoW will inspect ecological demarcation, fencing and buffers before adjacent work begins and during the weekly environmental inspection while that work continues. Site supervisors will check demarcation and fencing at the start of each working day where work is taking place immediately beside a sensitive habitat. Any encroachment or damage will result in work stopping in the affected area until the EcoCoW has identified and recorded the remedial action.
Protection of wildlife (general measures)	Trenches to be backfilled or covered overnight, or otherwise fitted with a means of escape to prevent entrapment, such as planks or ramps. Where used, ramps will be no greater than 45 degrees in angle.	Open trenches and excavations will be checked at the start of each working day and immediately before backfilling.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oCEMP. Lighting to be used only where required, and if used to be task specific and directed away from sensitive habitats including woodland, hedgerows, ponds and watercourses. The EcoCoW will monitor lighting usage and make recommendations for modifications where required.	Any trapped animal will be dealt with in accordance with advice from the EcoCoW and the occurrence will be recorded. Temporary ecological lighting controls will be checked before first use and following any complaint or EcoCoW observation.
Damage to birds nests	Vegetation clearance within the nesting bird season (March to August inclusive) to be avoided where reasonably practicable 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. Pre-construction checks by the EcoCoW will also be undertaken where land has been left bare during the nesting bird season and so may support ground nesting species. Where land is awaiting construction, ground cover will be managed under the direction of the EcoCoW so as not to encourage nesting within the future work area. Outline Reasonable Avoidance Measures (RAMs) Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	Each nesting-bird check will record the date, area inspected, findings and any exclusion zone established. Active-nest exclusion zones will be marked and checked at the frequency determined by the EcoCoW until formally released.
Disturbance of Wildlife and Countryside Act Schedule 1 bird species	A pre-construction survey for schedule 1 birds, with a focus on disturbance of sensitive species such as barn owl, will be undertaken prior to work commencing in any new location within the Site.	Where a Schedule 1 species is identified, work will not begin within the affected area until the EcoCoW confirms that the required avoidance or licensing arrangements are in place.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Damage or destruction of bat roosts	Trees present within the Site would be retained and protected during construction (in accordance with British Standard (BS) 5837:2012, as set out in **ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2]**. All trees within 50m of construction compounds, the East Park Substation and the East Park BESS would be subject to detailed pre-construction survey to assess bat roost potential and inform detailed design and/ or requirement for mitigation. Prior to the onset of works in any new field area, the EcoCoW would undertake a walkover survey to assess boundary trees for bat roosts. It would be the EcoCoWs responsibility to advise on additional mitigation to be employed, which may include changes to phasing of works, requirement for further surveys, licencing or works to be undertaken under watching brief of the EcoCoW. Prior to the onset of construction works within each Site (A, B, C and D) which have the potential to result in low level disturbance to individual bats potentially roosting within trees, Natural England would be notified by the EcoCoW of the Applicants intention to rely on the 'Incidental Result Defence' in accordance with Section 10(3)(c) of the Wildlife and Countryside Act. In the event detailed work plans are considered reasonably likely (by the EcoCoW) to result in higher levels of disturbance above this threshold (e.g., of a level potentially affecting local populations), no works will be undertaken until either a strategy is in place to reduce disturbance or a European Protected Species derogation licence issued under the Conservation of Habitats and Species Regulations 2017 has been obtained from Natural England. If as a result of detailed design trees require removal/felling the trees where works are required, and the removal has been approved in advance by the relevant local planning authority, those trees would 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 before felling.	Survey findings and any exclusion zone, licence or watching brief will be recorded before work begins.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	If bats are confirmed roosting within the tree(s), no removal would take place until a European Protected Species Mitigation Licence has been issued by Natural England. Trees with potential, but unconfirmed bat presence, would be felled under RAMS and Precautionary Working Method Statement, in line with BCT Guidance and UK Bat Mitigation Guidelines. Outline RAMs Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	
Killing/ injury of amphibians and/ or reptiles	Work with potential to affect great crested newts will be undertaken in accordance with the applicable Natural England licence and approved method statement. No harmful work within 250 metres of a known or assumed great crested newt breeding pond will begin unless the EcoCoW confirms that the applicable licence or avoidance measures are in place. RAMs will be implemented to avoid/reduce potential impacts on amphibians and reptiles, to include: • Clearance of suitable terrestrial habitat (e.g., tussocky grassland) to be undertaken following a two-stage cut. • Hedgerow removal to be subject to a hand search by the EcoCoW prior to removal. • Any suitable refugia (e.g., rubble piles) to be dismantled by hand under the watching brief of the EcoCoW. Stored materials to be kept on pallets or otherwise raised off the ground to discourage use as a refuge. Outline RAMs Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	Survey findings and any exclusion zone, timing restriction or licence will be recorded before work begins.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Damage to water vole burrows	Before any construction work within 10m of the top of the bank of a ditch or watercourse begins, the affected section will be inspected for water vole by the EcoCoW. Where evidence of water vole is identified, work will stop in the affected area and will only proceed once the EcoCoW has confirmed the required avoidance measures and any necessary licence. Outline RAMs Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	Survey findings and any exclusion zone, timing restriction or licence will be recorded before work begins.
Disturbance of otter	Before construction work begins near suitable otter habitat, the EcoCoW will undertake a pre-construction survey for holts and other evidence of otter. The survey area will include the suitable habitat within 100 metres of the proposed work where access is available and disturbance could occur. Where an otter holt or other constraint is identified, work will only proceed in accordance with the EcoCoW's instructions and any necessary licence. Outline RAMs Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	Survey findings and any exclusion zone, timing restriction or licence will be recorded before work begins.
Damage to badger setts or disturbance of badger using a sett.	A pre-construction survey for badger will be undertaken prior to work commencing in each relevant construction area to identify any newly excavated badger setts. A 20m buffer (30m for large, tracked machinery) will be maintained from active badger setts, to be set out with Heras fencing or similar, with no works to be undertaken within this area unless covered under a specific method statement and agreed by the EcoCoW. If any works to setts is deemed necessary, works will only proceed under an appropriate licence issued by Natural England.	Active-sett buffers will be checked before adjacent work begins and during relevant EcoCoW inspections. Soil or material stockpiles capable of being excavated by badgers will be fenced or checked daily for evidence of sett creation. Any new sett or change in sett activity will result in work stopping in

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Outline RAMs Method Statements are provided as **Appendix B**, which will be implemented as part of the final CEMP.	the affected area until the EcoCoW has reviewed the working method.
Injury/killing of fish	Where the 'dry crossing technique' is required for the creation of a new or widened access crossing, the section of water between the 'dams' will be inspected for fish and other aquatic life such as eels. Prior to dewatering, the coffer-dammed area will be inspected using electric fishing and/or fine mesh seine netting to ensure all fish, including juveniles, are safely relocated. Pumps will be fitted with 2mm aperture screens to prevent entrainment of elvers and glass eel. A Fish Rescue Plan will be prepared to include details dewatering methods to include the use of fish-safe meshes to be installed over any pumps, monitoring of water pH, and siltation. The Fish Rescue Plan will form a part of the final CEMP. The run-off and pollution controls elsewhere in the CEMP and approved SWMP will be implemented.	The Fish Rescue Plan will identify the competent person responsible for supervising dewatering and the frequency of checking pumps and screens. Dewatering will be suspended where fish distress, screen failure or unacceptable water-quality conditions are identified.
Spread of Invasive Non-Native Species (INNS)	Before construction begins, a botanical INNS walkover survey will be undertaken between May and October to identify the location and extent of INNS within the affected work areas. Identified INNS areas will be demarcated and no work will take place within them until the EcoCoW has approved the working method and the area has been addressed in the INNS Management Plan. Treatment and control will be undertaken by a suitably experienced specialist contractor in accordance with the approved INNS Management Plan, including measures for biosecurity, management of affected soils and long-term control or eradication..	Known INNS areas will be inspected before adjacent work begins and following treatment at the frequency specified in the INNS Management Plan. Plant and equipment leaving an affected area will be checked to confirm that the specified cleaning measures have been completed.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	If additional INNS is identified before or during construction, any activity that could spread it will stop in the affected area and the EcoCoW will identify the required measures. The EcoCoW will ensure that a toolbox talk is provided to contractors on avoidance / good practice measures required to avoid facilitating the spread of INNS.	The location, treatment, biosecurity checks, regrowth and any further treatment will be recorded.

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	Potential effects on the water quality of sub-catchments draining the construction area will be controlled through the approved SWMP. A minimum buffer distance of 10m from the bank top of watercourses, will be observed for all infrastructure. This is with the exception of access tracks, cable crossings (apart from HDD launch and reception pits) and drainage ditches. Temporary (construction phase) access track crossings over watercourses or drainage ditches will be removed following completion of the relevant construction works, and the affected watercourse banks, ditch profiles and surrounding land will be reinstated in accordance with the approved CEMP, SWMP and SMP. All reasonably practicable measures will be taken to prevent the mobilisation and deposition of sediment from construction activities to any existing watercourse. Trenching, excavation and other exposed-earth activities will stop during intense rainfall where there is a risk of sediment mobilisation and will not resume until the ECoW confirms that the ground and sediment controls are suitable. Silt fencing and, where appropriate, filter strips will be installed to intercept run-off from foundations, cable trenches, access roads and other earthworks in accordance with the approved SWMP. Silt matting will be installed at settlement-pond outfalls where required by the approved SWMP. Check dams or equivalent flow-control measures will be installed where the longitudinal gradient of a drainage ditch exceeds 3%, and elsewhere where identified by the approved SWMP or ECoW. Tracks within the Site and any other hard surfaces will be kept clean, this is to prevent mud and sediment accumulating on these surfaces, which may then mobilise in rainfall events.	Temporary (construction phase) drainage features will be regularly monitored throughout construction in accordance with the approved SWMP. A detailed watercourse quality monitoring plan will be agreed with the Environment Agency as part of the final CEMP. This would include details of all baseline, construction phase and post construction (operational phase) monitoring, which will involve both visual assessments and quality testing. Monitoring will begin at least six months before construction starts to establish a baseline. Monitoring during the baseline phase will be once per month. This frequency will continue through the construction phase, however should be increased in frequency at certain locations during (and downstream of) certain key construction activities (such as significant earthworks). Monitoring will go into the first 6 months of operation. Monitoring will again be carried out for the decommissioning phase.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Wastewater from dewatering or similar activities will not be discharged to surface water, groundwater or foul drainage unless the required approval or permit and treatment controls are in place. Bare ground will be stabilised or revegetated as soon as reasonably practicable following completion of the relevant work.	The locations for water quality monitoring will include upstream and downstream of surface water outfalls or watercourse crossings, with final locations to be set out in the final CEMP.
Chemical and fuel spillages	Equipment and spill kits will be provided at fuel and chemical storage, refuelling and other relevant work areas to contain and clean up any spills to minimise the risk of pollutants entering watercourses. 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 to prevent the accumulation of rainwater and to prevent accidental damage. Plant will not operate or refuel within a fuel or chemical storage area unless the specified spill-prevention and containment controls are in place. An Environmental Incident Management and Pollution Prevention Plan (EIMP) will be produced prior to construction activities commencing and will be reviewed at least annually 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 procedure for incident response. In the unlikely event of any incident, the Construction Project Manager will be notified and will work to co-ordinate remedial actions. The above measures are for the protection of surface water, groundwater, and watercourses.	Fuel and chemical storage areas, bunds and spill kits will be inspected before first use and at least weekly while in use. Temporary refuelling locations will be checked before and after each use. All spills, notifications, clean-up measures, waste disposal and corrective actions will be recorded and tracked through to completion.
Increased runoff volume during storm events	Where inspection or water-quality monitoring demonstrates that the other approved sediment controls are insufficient, a settlement pond will be installed in accordance with the approved SWMP.	Each settlement pond will be inspected before first use, weekly

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Settlement ponds would be sited downslope of the main construction areas to effectively capture and treat run-off from these areas. After the construction phase the ponds will be reinstated to the current conditions. The ponds will be sized to ensure sufficient treatment during construction.	while operational and following heavy rainfall. Silt will be removed and defects repaired where required to retain effective treatment.
Foul Drainage	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.	Collection tanks will be checked on each working day that they are in use. Collection and disposal records will be retained.
Risk of flooding to Site Operatives	A Flood Warden will be appointed and will review relevant flood warnings and weather forecasts before work begins in a flood-susceptible area. Where a warning, forecast or observed condition indicates a risk of flooding, operatives will be alerted and the affected work will be rescheduled, stopped or evacuated in accordance with the Flood Warning and Evacuation Plan.	The Flood Warden will record each relevant flood warning or event, the areas affected, the decision taken and the time at which work was stopped and resumed. Following any flood event affecting construction, the effectiveness of the response will be reviewed and any required corrective action recorded.

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
Increased traffic flows, including HGVs, on the roads leading to the Site. Severance and intimidation associated with increased construction traffic and abnormal loads.	Construction traffic would be managed in accordance with an approved Construction Traffic Management Plan (CTMP) which will be produced prior to the commencement of construction activities in accordance with Requirement 8 of the draft DCO. An **outline CTMP [EN010141/DR/7.4]** is provided with the application. This includes measures to be implemented to mitigate impacts from increased construction traffic, including the proposed routing strategy. The arrival and departure times will be managed to minimise the number of HGVs travelling to and from the Site during the highway peak hours. All construction traffic will be directed to the single main site access junction off the B645 (SA16). Construction staff will be encouraged to use shared or lower-car travel arrangements. The measures will include car sharing, internal minibuses and, during peak construction activity, a collection and drop-off service from the locations identified in the approved Construction Workers Travel Plan.	Monitoring will be undertaken in accordance with the approved CTMP.
Impact upon users of PRoW within the Site.	An **outline Public Right of Way Management Plan [EN010141/DR/7.8]** has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction in accordance with a Requirement of the **draft DCO [EN010141/DR/3.1]**. Any temporary diversion will be limited to the area and period reasonably required for the relevant construction activity and will be implemented only in accordance with the approved PRoWMP. Work at PRoW crossings will be phased to minimise the duration of any diversion or managed closure. Where a PRoW intersects or is used by construction traffic, the signage, fencing, banksman, managed crossing, temporary closure or diversion specified in the approved PRoWMP will be installed before the interaction begins.	Each affected PRoW, crossing or diversion will be inspected before it is brought into use, at the start of each working day while the construction interaction continues and following completion of the work. Inspections will cover the route surface, temporary fencing, signage, barriers, crossing controls and whether the approved route remains safely available. The required equestrian-priority and vehicle stop-and-hold arrangements

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
		will be checked before construction traffic begins using an affected bridleway. Any obstruction, damaged control, route defect, near miss or complaint will be recorded. Safety defects will be made safe immediately before work continues.
Damage to the highway	Joint pre- and post-construction condition surveys (with dated photographs) of all agreed construction routes and access points will be undertaken with the relevant local highway authority. Any damage to the public highway clearly attributable to construction traffic will be promptly repaired and reinstated by the Principal Contractor to the reasonable satisfaction of the local highway authority. The condition of construction routes and access points will also be checked through minimum monthly inspections during construction.	Pre-construction, interim and post-construction condition-survey records will be retained. Interim inspections will also check for mud, dust, debris or obstruction arising from construction traffic. Defects will be logged with the investigation, responsibility and date of repair.

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
Impact of noise arising from construction activities at noise sensitive receptors (NSR).	Work will be undertaken in accordance with a Construction Noise Management Plan (CNMP), which will be prepared as part of the final CEMP. Best practicable measures will be employed in accordance with BS5228-1:2009+A1:2014 to control noise generation. Noise controls at noise-sensitive receptors will include: restricting construction to 08:00–18:00 Monday to Friday and 08:00–13:00 Saturday unless otherwise approved; routing plant away from receptors where practicable; maintaining plant; fitting effective silencers and acoustic hoods where required; switching plant off when not in use; using non-tonal broadband reversing alarms where safe and practicable; using temporary acoustic screening where required; maximising separation from significant noise sources; and giving affected receptors clear information about the timing and duration of planned high-noise activities.	The CNMP will identify the activities and receptor locations requiring attended or continuous noise monitoring and the applicable action levels.
Impact of vibration arising from construction activities at vibration sensitive receptors.	Before piling or another potentially significant vibration-generating activity begins, the task-specific assessment will identify the least-vibration method where reasonably practicable. Non-percussive piling methods will be used where suitable for the required works.	Vibration monitoring will be undertaken where the task assessment identifies a risk of approaching an action level or where a complaint indicates potential adverse vibration.
Impact of noise on equestrian users.	Where construction activities or construction traffic operate in close proximity to bridleways or other PRoW suitable for equestrian use, the Principal Contractor will, through the Construction Noise Management Plan (CNMP), implement measures requiring advance warning signage and instructions to drivers and banksmen to stop and hold plant and vehicle movements when horses are passing (in accordance with the approved oPROWMP), and to pause or reduce non-essential noisy activities (particularly impulsive or intermittent sources) until	Warning signage, driver instructions and any required banksman arrangements will be checked before the relevant activity begins.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	the equestrian user has cleared the immediate works interface, applying best practicable measures in accordance with BS 5228.	Advance notifications to the equestrian landowner will be recorded.
	Where construction activities are required within 100m of a horse paddock or equestrian land use, the Construction Noise Management Plan (CNMP) will define an 'equestrian sensitivity zone' and require enhanced best practicable measures in accordance with BS 5228, including (so far as reasonably practicable): • siting static plant and particularly noisy activities as far from the equestrian receptor as possible; • use of temporary (construction phase) acoustic screening/hoarding between the works and the paddock; • careful management of impulsive/intermittent noise sources; and • proactive liaison with the equestrian land owner to provide advance notice (minimum 1 week) of short-term higher noise activities such as piling.	

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.	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. A complete list of mitigation measures is set out in in the **outline Construction Dust Management and Monitoring Plan (oCDMMP),** which is provided as Appendix A to this oCEMP. A final CDMMP will be prepared prior to the commencement of construction and will include the following measures to reduce and control dust impacts.	Monitoring to be undertaken in accordance with the approved CDMMP which will form part of the final CEMP.
Impacts of gaseous emissions from use of on-site plant and non-road mobile machinery (NRMM)	Before plant is brought onto the Site, the Principal Contractor will verify its emissions standard. NRMM will comply with at least Stage IIIB and diesel generators will comply with Stage IV, unless the final CEMP records why compliant equipment is not reasonably available and identifies the alternative emission controls to be applied.	A plant register will record the plant type, identification number, engine rating, emissions stage and supporting certification before first use.

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
Localised contamination from made ground	Measures to avoid, reduce or minimise impacts during the construction phase from potential localised contamination in made ground on the Site will be informed by **ES Vol 2 Appendix 12-1 Stage 1 Geo-Environmental Assessment [EN010141/DR/6.2]**, supplemented with pre-construction site investigation and assessment during the detailed design phase, which will be reported in a Ground Investigation Report. The measures used to manage impacts from potential contamination will include, but not be limited to the following:- • Implementation of the measures set out in the **outline Soil Management Plan [EN010141/DR/7.9]** which will be developed into a final Soil Management Plan in accordance with a Requirement of the **draft DCO [EN010141/DR/3.1]**. • An Unexpected Contamination Protocol will be developed and included in the final CEMP, setting out procedures for assessment and remediation if contamination is identified. Any contamination identified will be investigated and risk-assessed, with remediation strategies and verification implementation plans developed as required. • A Piling Risk Assessment (PRA) will be produced prior to construction, as informed by pre-construction site investigation, and provided as part of the Ground Investigation Report.	Monitoring in accordance with the Unexpected Contamination Protocol to be approved as part of the final CEMP.
Contamination of ground and controlled waters from bentonite	• The horizontal direction drill (HDD) process requires the use of bentonite as a lubricant for the drill bore. The use of the material will be carefully controlled to avoid a breakout and/or spillage from tanks and plant at the drive shaft. A Frac-Out Contingency Plan will be provided by the Principal Contractor in advance of the work starting. Bentonite will be recycled during the HDD process and will be disposed of as a controlled waste during and following the completion of drilling activities. Appropriately bunded storage	Monitoring to be undertaken in accordance with the Frac-Out Contingency Plan by the ECoW.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	containers will be provided at both HDD launch and reception sites to contain any bentonite slurry arisings.	
Contamination of groundwater	A groundwater monitoring programme is to be completed if shallow groundwater is identified in the ground investigation. The groundwater monitoring programme will be completed in line with LCRM and appropriate British Standard guidance, and the approach approved prior to the commencement of construction.	The groundwater-monitoring programme will identify the monitoring locations, parameters, baseline period, frequency during construction, action levels and post-work monitoring. An approved-products register will record the PFAS review before each relevant product is first brought onto the Site. The register will be audited monthly.
	The Principal Contractor shall, wherever reasonably practicable, ensure that fuels, oils and other chemicals used during construction, including bentonite, cleaning agents, decontaminants and similar products, are free from intentionally added PFAS. Product selection shall be subject to a materials approval process, including review of safety data sheets and supplier confirmation where reasonably available. Where PFAS-free alternatives are not reasonably practicable, products shall be selected, stored, handled and used so as to minimise the risk of contamination to soil, groundwater and surface water.	
Dust, debris and litter generation	Dust will be controlled in accordance with Table 5.7 and the approved CDMMP. Construction areas will be kept tidy and waste or lightweight materials will be secured to prevent wind-blown litter and debris.	Dust monitoring will be undertaken in accordance with Table 5.7. Housekeeping, waste storage and wind-blown litter will be checked during the weekly environmental inspection and following high winds.
Generation of silty and otherwise contaminated run-off	Silt traps and other sediment controls will be installed in accordance with the approved SWMP. The Environmental Incident Management and Pollution Prevention Plan will identify the response and external-notification requirements for contaminated run-off.	Monitoring will be undertaken in accordance with Table 5.4 and the approved SWMP.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Vehicles, plant machinery and equipment will be cleaned at designated wash areas located conveniently and within a controlled area of the Site. These areas will be lined so as to prevent infiltration to groundwater. The washdown areas will be located at least 10 m from the top of bank of watercourses. Runoff from these areas will be appropriately stored and subsequently treated, either by onsite options such as oil separators and settlement lagoons, or else stored then tankered and appropriately treated offsite. No untreated runoff will be allowed to infiltrate to groundwater or discharge to surface water bodies. Details will be confirmed in the final CEMP. The above measures are for the protection of surface water, groundwater, and watercourses.	
Encountering ground water when excavating	If groundwater is encountered unexpectedly, excavation will stop locally and the ECoW will be notified. Dewatering will not begin until an appropriate method, treatment requirement and lawful discharge or disposal route has been identified and approved. Dewatering may use cut-off trenches and pumping where those measures are included in the approved method.	Each occurrence of groundwater will be recorded, including the location, depth, condition and management method.
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.	Sewage-storage systems will be checked daily while in use. Collection and disposal records will be retained.
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 will be housed appropriately in covered areas to prevent the accumulation of rainfall. These areas will be covered with impermeable surfacing	Fuel and chemical storage, bunds, valves, separators and spill kits will be inspected before first use and at least weekly while in use, with monitoring by the ECoW.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	and bunded, with an appropriate valve outlet to allow any standing water to be released. An oil separator will be used on the outlet from these bunded areas. The bunded areas will have a minimum capacity of 110% of the capacity of the containers. 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. Fuel storage and refuelling areas will be located at least 10 m away from the top of bank of watercourses. The above measures are for the protection of surface water, groundwater, and watercourses.	
Pollution from the decommissioned oil pipeline	A former oil pipeline crosses Site B and part of Site A, the alignment of which is shown on **ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3]**. The pipeline has been decommissioned but remains buried in the ground, and there is the potential for small amounts of residue to remain sealed within the pipe. Whilst no specific easement has been applied to the pipeline, its precise location will be marked out during construction and no piling for the solar array mounting structures will take place that could cause any structural damage to the pipeline, and an appropriate offset will be applied to ensure that any vibration from piling will not damage the pipeline.	The survey, marked alignment and required offset will be checked and recorded before work begins. Compliance with the offset will be checked during piling in the relevant area.

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	• The measures set out in the **outline Soil Management Plan [EN010141/DR/7.9]** will be developed into and implemented through a final Soil Management Plan in accordance with Requirement 7 of the **draft DCO [EN010141/DR/3.1]**.	Monitoring to be undertaken in accordance with the approved SMP.
Impacts to Peat	It is not expected that there is any peat within the Order limits, however should surface-level peat (or other peat) that has the potential to be impacted by the Scheme be encountered during an investigation or construction activity, work will stop in the affected area and a suitably qualified specialist will confirm whether peat is present and could be affected. Where peat is confirmed, a Peat Management Plan will be prepared and approved as part of the final CEMP before work resumes in accordance with the Peat Management Plan in that area.	The location, extent and assessment of suspected peat will be recorded. Where a Peat Management Plan is required, monitoring will be undertaken at the locations and frequency specified in that plan.

Table 5.10: Summary of the construction mitigation and management measures – Socio economics, Land Use and Tourism

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disruption to users of Public Rights of Way	The measures in Table 5.5 and the approved PRoWMP will apply.	Monitoring will be undertaken in accordance with Table 5.5 and the approved PRoWMP.
Disruption to local residents, businesses, and community facility use	Measures to mitigate the effects of visual impacts during construction are outlined in Table 5.1: Landscape and visual. Measures to mitigate the effects of traffic during construction are outlined in Table 5.5 Traffic and Transport Measures to mitigate the effects of noise during construction are outlined in Table 5.6 Noise and Vibration Measures to mitigate the effects on air quality during construction are outlined in Table 5.7 Air Quality	Monitoring will be undertaken in accordance with Tables 5.1, 5.5, 5.6 and 5.7. Each enquiry or complaint will be recorded in the Complaints Register, investigated and closed out with the action taken or the reason no further action was required. The Complaints Register will be reviewed weekly to identify repeated or wider issues.

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 upon on-site workers from extreme weather events and conditions	Weather conditions will be actively monitored, with forecasts reviewed daily to inform site operations. This includes proactive planning to account for the possibility of extreme weather events including the use of extreme weather alert systems.	The forecast, relevant warnings and any resulting change to the planned work will be recorded in the daily briefing or task record. Any weather-related incident or near miss will trigger review of the relevant RAMS and training.
	Risk Assessment Method Statements (RAMS) will be developed for site activities, ensuring appropriate safety and stop work measures are in place for adverse weather conditions.	
	Staff will be provided with climate-appropriate PPE and trained in extreme weather response protocols.	
Damage to equipment from extreme weather events / climate conditions	Construction materials will be chosen to be resilient to expected climatic extremes and comply with appropriate safety standards and weather conditions, in order to account for climate change. Construction materials susceptible to weather damage would be covered when stored for protection.	Relevant product specifications will be checked before acceptance or installation. Stored materials and exposed equipment will be inspected before a forecast severe-weather event and following an event likely to have caused damage.
Release of greenhouse gas emissions during construction	Sustainable construction methods (including adoption of the Considerate Constructors Scheme) will be adopted, including: • Regular planned maintenance of the construction plant and machinery will be carried out to optimise efficiency.	Plant-maintenance records will identify the applicable service intervals and completion of servicing. Unnecessary idling and inefficient plant operation will be checked

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	• Implementing measures to decrease fuel use by maximising efficiencies, avoiding engine idling and checks made to ensure vehicles conform to current UK emissions standards. All members of the supply chain providing a carbon reduction plan where feasible. The Principal Contractor will consider the use of certified Hydrotreated Vegetable Oil (HVO) or other sustainable low-carbon fuels where compatible with plant specifications, manufacturer warranties, fuel availability, sustainability credentials and health and safety requirements, and where reasonably practicable.	during routine inspections and non-conformances recorded. Supplier carbon information and the decision on use of HVO or another lower-carbon fuel will be retained with the relevant procurement or plant record.
Embodied emissions from material used in construction of scheme	The Applicant and Principal Contractor will apply the carbon reduction hierarchy during detailed design, procurement and construction planning by first seeking to avoid unnecessary material use, then reduce material quantities, waste and transport, then substitute lower-carbon materials, products and components where reasonably practicable. The embodied carbon of materials and components will be factored into the procurement process, and where reasonably practicable lower-carbon or locally sourced materials will be selected, in order to minimise the Scheme's lifecycle greenhouse gas emissions. This will include consideration, within the approved design parameters and without giving rise to materially new or materially different environmental effects, of efficient foundation and mounting design, modular or prefabricated components, reduced concrete and steel quantities, lower-carbon concrete or cement substitutes, recycled-content metals, reusable temporary works, and efficient materials logistics.	The final CEMP will identify the principal material categories for which embodied-carbon or recycled-content data will be collected and the design estimate or benchmark against which procurement will be reviewed. Procurement records will identify the selected product, available carbon or recycled-content information and any practicable lower-carbon alternative considered.
Re-use of material where possible, measures for recycling of materials	The measures in Table 5.12 and the approved Waste Management Plan will apply.	Monitoring will be undertaken in accordance with Table 5.12 and the approved WMP.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Fugitive emissions of sulphur hexafluoride (SF6) from gas-insulated electrical equipment	SF6-free electrical components will be prioritised wherever feasible to eliminate emissions from gas-insulated switchgear and transformers. For any equipment that uses SF6, only sealed-for-life components with the lowest practicable leakage rates will be used to minimise fugitive emissions.	Before installation, the equipment schedule and manufacturer's information will identify any SF6-containing equipment and its stated leakage performance. Any SF6 added, recovered or released during construction or commissioning will be recorded.

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
Impact of waste arising from construction activities on the site.	An **outline Waste Management Plan [EN010141/DR/7.12]** has been prepared and will be developed into a final Waste Management Plan prior to the start of construction in accordance with a Requirement of the **draft DCO [EN010141/DR/3.1]**, with approval by the relevant local planning authorities.	Monitoring to be undertaken in accordance with the approved WMP. A waste register will be updated for every off-site movement and will record the date, waste type, EWC code, quantity, carrier, destination facility and whether the waste was reused, recycled, recovered or disposed of.
	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.	
	Implementation of measures to reduce waste through control over materials procurement, to include: • 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.	
	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 securely prior to collection by an approved waste contractor.	
	Waste to be collected by an approved, licensed third party waste facility for recycling and disposal.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Materials arising from site clearance or construction will be reused where suitable. Excavated material will be reused in accordance with the approved SMP and any applicable Materials Management Plan. Where material is initially unsuitable, treatment for reuse will be considered before off-site disposal.	
	Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier.	
	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.	

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;
- Procedures for monitoring the construction programme against the programme approved within the final CEMP, including the trigger for notifying the relevant LPA and preparing a further environmental assessment where the construction programme is proposed or forecast to exceed the 30-month construction programme assessed in the ES;
- Document control systems and procedures;
- Detail of the communication strategy (stakeholders and third parties);
- 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 necessary 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. The final CEMP will identify the monitoring, inspections and audits to be undertaken, the person responsible, the applicable frequency or trigger, the records to be maintained and the procedure for identifying, recording and closing out any corrective action..

7.1.2 The Environmental Manager will oversee monitoring of compliance with the CEMP throughout the construction phase, supported by the ECoW and other relevant specialists identified in the CEMP. 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 undertake regular walkover surveys of the site to monitor compliance with the CEMP. They will undertake regular inspections as required by the CEMP and overall audits of the CEMP to ensure compliance with its requirements. They will meet regularly with the Construction Project Manager to discuss the construction programme and any issues arising from that or their inspection/monitoring activities. They will undertake day-to-day contact with relevant local authorities and other regulatory agencies (such as the Environment Agency).

7.1.3 As part of the regular meetings between the Environmental Manager and Construction Project Manager, the construction programme will be reviewed against the programme approved within the final CEMP. Where that review identifies that the approved construction programme is likely to be exceeded, the Environmental Manager will record the reason for the forecast exceedance, identify whether any additional or amended environmental mitigation or monitoring may be required, and notify the relevant LPA in accordance with section 2.4 of this oCEMP.

7.1.4 The results of monitoring, surveys, inspections and audits, together with any identified non-compliance and corrective action, will be recorded in the central record-keeping system established in Section 7.2 and made available for inspection on request by the relevant LPA.

7.1.5 Where complaints are received from members of the public these will be logged by the Construction Project Manager in a Complaints Register. This will include details of the complaint, and actions arising from the same.

7.1.6 Similarly, where matters or complaints are raised by the CLG, these will be logged by the Community Liaison Officer in a Complaints Register. This will include details of the matter/complaint, and actions arising from the same.

7.1.7 All complaints will be reviewed by the Construction Project Manager, Community Liaison Officer, and Environmental Manager, and the result of the review and any corrective actions taken will be logged. The Complaints Register 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 Management System (QMS) and Environmental Management System (EMS) will be provided by the Principal Contractor. The EMS will be certified in accordance with ISO 14001.

7.2.2 Those systems will ensure that records are kept of environmental monitoring, inspections and audits, the implementation of environmental management measures, incidents and non-compliances, and corrective actions.

7.2.3 A central record keeping system will be established (by the Quality Manager, 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 records will include, as a minimum:

- Licences, approvals, and other similar regulatory documentation.
- Environmental surveys.
- Environmental equipment test records.
- An Environmental Action Schedule, identifying each action, the person responsible, the target completion date and the date on which the action was closed out.
- 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 The CEMP will be reviewed at the intervals specified in the approved CEMP and where required in response to monitoring results, an incident, a complaint or a material change in construction activities. Any amendment to the approved CEMP must be approved in writing by the relevant LPA before it is implemented.

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

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

EAST PARK ENERGY

East Park Energy

EN010141

Outline Construction Environmental Management Plan

Appendix A: Outline Construction Dust Management and Monitoring Plan

Document Reference: EN010141/DR/6.2

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

September 2025

Version P01

EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Outline Construction Environmental Management Plan

Appendix A: Outline Construction Dust Management and Monitoring Plan

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/7.3
Author:	Smith Grant LLP

Version	Date	Status
P01	September 2025	DCO Submission

CONTENTS

1.0 Construction Dust Management and Monitoring Plan

1.1 Introduction

1.1.1 This outline Construction Dust Management and Monitoring Plan (oCDMMP) has been prepared for the construction phase of the East Park Energy project (the 'Scheme').

1.1.2 The following sets out the oCDMMP to be included within the outline Construction Environmental Management Plan (oCEMP) that is to be submitted with the DCO application.

1.1.3 If the DCO is granted, the oCEMP will be developed into a final Construction Environmental Management Plan (CEMP) once a contractor is appointed. A final CDMMP is to be incorporated within the final CEMP.

1.1.4 The final CEMP(s) produced for any phase of the Scheme will be in substantial accordance with this oCEMP, as set out in a Requirement of the **draft DCO [EN010141/DR/3.1]**, and approved by the relevant local planning authority (LPA) before construction commences.

1.2 Mitigation

1.2.1 The dust management measures are based on the Institute of Air Quality Management (IAQM) guidance on construction dust. As set out in the air quality / dust assessment described in **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** the measures are based on the recommended measures (desirable and highly recommended) provided for medium risk sites, adapted as appropriate to the specific Scheme. These measures would serve to minimise fugitive dust generation and any potential PM_{10} and $PM_{2.5}$ emissions.

1.2.2 These measures are in additional to elements of the design and as set out elsewhere in the oCEMP and oCTMP, which would serve to reduce generation of dust.

1.2.3 Overall responsibility for the management and control of dust would lie with the Construction Project Manager.

1.2.4 As an over-riding measure, if any operations are identified as causing or likely to cause visible dust emissions towards sensitive site boundaries those operations would be modified, reduced or suspended until effective remedial action can be taken or the meteorological conditions giving rise to the emissions have moderated.

Table 1: Recommended Dust Mitigation Measures

Communications
Develop and implement a stakeholder communications plan that includes community engagement before work commences on the Scheme.
Display the name and contact details of the person(s) accountable for air quality and dust issues at the site entrance(s). This may be the Construction Project Manager or the Environment Manager.
Display the head or regional office contact information.
Develop and implement a Construction Dust Management and Monitoring Plan (CDMMP) to be incorporated within the oCEMP
Site Management
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner and record the measures taken.
Make the complaints log available to the local authority when asked.
Record any exceptional incidents that cause dust and/or air emissions, both on- or off-site and the action(s) taken to resolve the situation in the log book.
Hold regular liaison meetings with any other high risk construction sites within 250m of the Order Limits, to ensure all plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport / deliveries which might be using the same strategic road network routes.
Monitoring
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked.
Carry out regular site inspections to monitor compliance with the CDMMP, record inspection results and make an inspection log available to the local authority, when asked.
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

Preparing and maintaining the Site
Construction Compounds to be formed of heavy-duty construction matting
Temporary internal access roads to be formed of heavy-duty construction matting and / or compacted stone
Other internal access tracks to be used for construction traffic to be formed of heavy-duty construction matting and / or compacted stone or to be upgraded / restored if existing tracks
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as practical or possible.
Erect solid screens or barriers around dusty activities or the Scheme that are at least as high as any stockpiles on the Scheme.
Fully enclose any specific operations where there is a high potential for dust production and the site is active for an extensive period.
Avoid site runoff of water or mud.
Keep site fencing, barriers and scaffolding clean using wet methods.
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site.
Retention of stockpiles of loose materials for shortest time as possible; clear delineation of stockpiles. Cover, seed or fence stockpiles to prevent wind whipping.
Operating Vehicles / Machinery and Sustainable Travel
Ensure all vehicles switch off engines when stationary – no idling vehicles.
Minimise the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable.
Impose and signpost maximum-speed-limit of 20mph along the internal access roads and tracks
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
Full measures to encourage sustainable travel would be set out in the final CTMP that would be prepared by the contractor.
Operations
Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques, such as water sprays or local extraction.
Ensure an adequate water supply on site for effective dust / particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
Provision of suitable dust suppression, particularly during prolonged dry and windy weather; to include use of water bowsers with suitable spray bars (or similar) to dampen down internal haul routes and exposed areas
Use enclosed chutes and conveyors and covered skips.

Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use the fine water sprays on such equipment wherever appropriate.
Retention of stockpiles of loose materials for the shortest time period possible; stockpiles of materials to be clearly delineated
Ensure equipment is readily available on site to clean any dry spillages. Clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
Waste Management
Avoid bonfires and burning of waste materials.
Measures specific to Earthworks
Only remove the soil cover in small areas during work and not all at once to minimise exposed areas.
Re-vegetate earthworks and exposed areas / soil stockpiles to stabilise surfaces as soon as practicable.
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.
Measures specific to Construction
Ensure sand and other aggregates are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
Where practicable, storage of excavated soils from the grid connection adjacent to the trenches in preparation for backfilling
Avoid scabbling (roughening of concrete surfaces) if possible.
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.
Measures specific to Internal Traffic Movements & Trackout
Ensure sheeting of all incoming / outgoing vehicle carrying loose loads to prevent escape of materials during transport.
Inspect on-site haul routes and access tracks for integrity; regular compaction, grading and maintenance to maintain a smooth-running surface
Record all inspections of haul routes and any subsequent action in a site log book
Provision of heavy-duty matting / compacted aggregate surfacing to internal haul routes; to be regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers.
Provision of wheel cleaning facilities at appropriate locations at any exits from works areas onto the public highway

Regular inspections of the Main Site access, other access points, crossing points and local access points; use of water-assisted dust sweeper(s) on stretches of public highway at these access and crossing points to remove any material tracked out of the Site as necessary.

1.3 Monitoring

1.3.1 Monitoring would include visual inspections and quantitative monitoring for dust as described below.

1.4 Visual Dust Monitoring

1.4.1 The Construction Project Manager, or delegated appropriately trained site personnel, will carry out visual inspections at least once a day during the construction phase. Careful consideration will be taken during continuous periods of dry and windy weather.

1.4.2 The inspections will include visual assessment of:

- prevailing weather conditions and likelihood for increased risk of dust generation;
- potential dust generating activities;
- areas where dust generating activities, particularly soil stripping and earthworks, are occurring close to site boundaries;
- access points, crossing points and nearby stretches of public highway for signs of track-out.

1.4.3 In addition, site operatives will be instructed to inform the Construction Project Manager whenever visible dust emissions are observed crossing, or extending towards, the site boundaries as a result of any operation or process.

1.4.4 Any problems observed, and in particular occurrences of dust potentially crossing site boundaries, will be reported to the Site Manager (or delegated personal) who will carry out investigations and remedial actions if required. This may include provision of additional dust suppression or modification, reduction or cessation of activities, until suitable weather conditions pertain.

1.4.5 All observations and findings will be recorded daily in a site record kept specifically for the purpose. Information recorded will include:

- location of observation;
- weather conditions (rainfall, wind speed and direction);
- current site activities
- any off-site activities with a potential for dust generation;
- observation of any visible dust travelling beyond the site boundary;
- details of any remedial action undertaken as a result.

1.4.6 The frequency of visual monitoring would increase in the following scenarios

- observations detect significant dust plumes crossing the Site boundary towards off-site receptors;
- monitoring of meteorological conditions identifies a prolonged dry, warm spell;
- site operatives inform the Construction Project Manager of significant dust emissions within 100m of a Site boundary; or
- in response to a complaint being received by the Site or the Local Planning Authority (LPA).

1.5 Quantitative Dust Monitoring

1.5.1 The Dust Monitoring Scheme has been designed taking into account the proposed layout of the Site and nature of the surroundings.

1.5.2 A period of dust monitoring would be undertaken prior to the commencement of the construction works to provide a baseline of conditions upwind and downwind of the Site. This would be for a period of at least 3 months or longer to ensure at least 3 summer months are captured, where summer months are considered as April to September. Thereafter the monitoring would continue throughout the duration of the Construction Phase.

Monitoring Methodology

1.5.3 Monitoring would be undertaken using combined deposition / directional dust gauges; these comprise 'Frisbee-type' dust deposition samplers with an adhesive 'sticky pad' directional dust sampler around the collection bottle. The monitor measures total daily dust deposition and directional dust.

1.5.4 All gauges will be installed by a suitable qualified and experienced supplier under supervision of an environmental consultant.

1.5.5 Samples would be collected by suitably trained personal on at least a monthly basis and submitted for analysis at an UKAS-accredited laboratory.

1.5.6 The dust samples would be analysed for the following:

- Mass of dissolved and undissolved solids to determine deposition rate as mg/m2/day using Method No. FD01: The determination of Fugitive Dust based on BS 872:2005 (mass of dust (mg) is the UKAS accredited test); and
- % Effective Area Covered (EAC) to determine surface soiling and direction of impact using Method No. FD05: The determination of reflectance values using a smoke stain reflectometer (% reflectance is the UKAS accredited result reported).

1.5.7 The results would all be reported as averages over the monitoring period (i.e. over a monthly period).

Monitoring Locations

1.5.8 The proposed monitoring locations have been selected to provide locations at sensitive site boundaries to each key area of working, with upwind and downwind locations. The proposed locations are as summarised below in Table 1 and provided in Drawing D01.

1.5.9 The proposed locations would be refined during the development of the detailed CEMP. Actual locations would then be determined by conditions at the time of monitor deployment taking into account factors such as access, health and safety, physical constraints and security. The locations would be

confirmed to the LPA on completion of deployment. Where possible dust monitoring locations would be co-located with any noise monitoring locations.

1.5.10 All locations would be subject to monitoring during the baseline monitoring period, Enabling Works and initial construction phases. Monitoring in some locations may cease on completion of construction works and internal haulage in those areas, such as on completion of construction in Site C, East Park Sub-Station and associated grid connection between East Park Sub-Station and Site D.

Assessment Criteria

1.5.11 The dust monitoring results would be interpreted in relation to the following benchmarks:

- Deposited dust: 140 mg/m^2/day (to provide a 'trigger' threshold for investigation to identify the likely dust source(s), taking account of the direction data and sampling location; based upon 'complaints likely in the open country');
- Deposited dust: 200 mg/m^2/day (based upon standard 'custom and practice' limit; dependant on dust colour-contrast);
- Soiling: 0.5% EAC/day (based on 'possible complaints').

1.5.12 However, it should be noted that these thresholds are applicable to locations where the dust deposition may give rise to annoyance or disamenity. As such they are not specifically applicable to monitoring locations that do not represent relevant exposure and the results will be interpreted accordingly taking into account the monitor location.

Reporting

1.5.13 A report would be provided on completion of the initial deployment of the baseline monitoring. This would set out the monitoring locations utilised, including a photographic record, and methodology to be employed. A baseline summary report would be provided to the LPA on completion of the pre-construction phase monitoring. This report would set out the results of the

baseline monitoring, along with details of the monitoring to be continued for the following 12 months.

1.5.14 Subsequent quantitative monitoring results would be collated and reported to the LPA on a monthly basis. The monthly reports would detail the dust deposition and soiling results (in a tabular form) and would include commentary of any exceedances identified of the above thresholds and what remedial actions or contingencies were put in place.

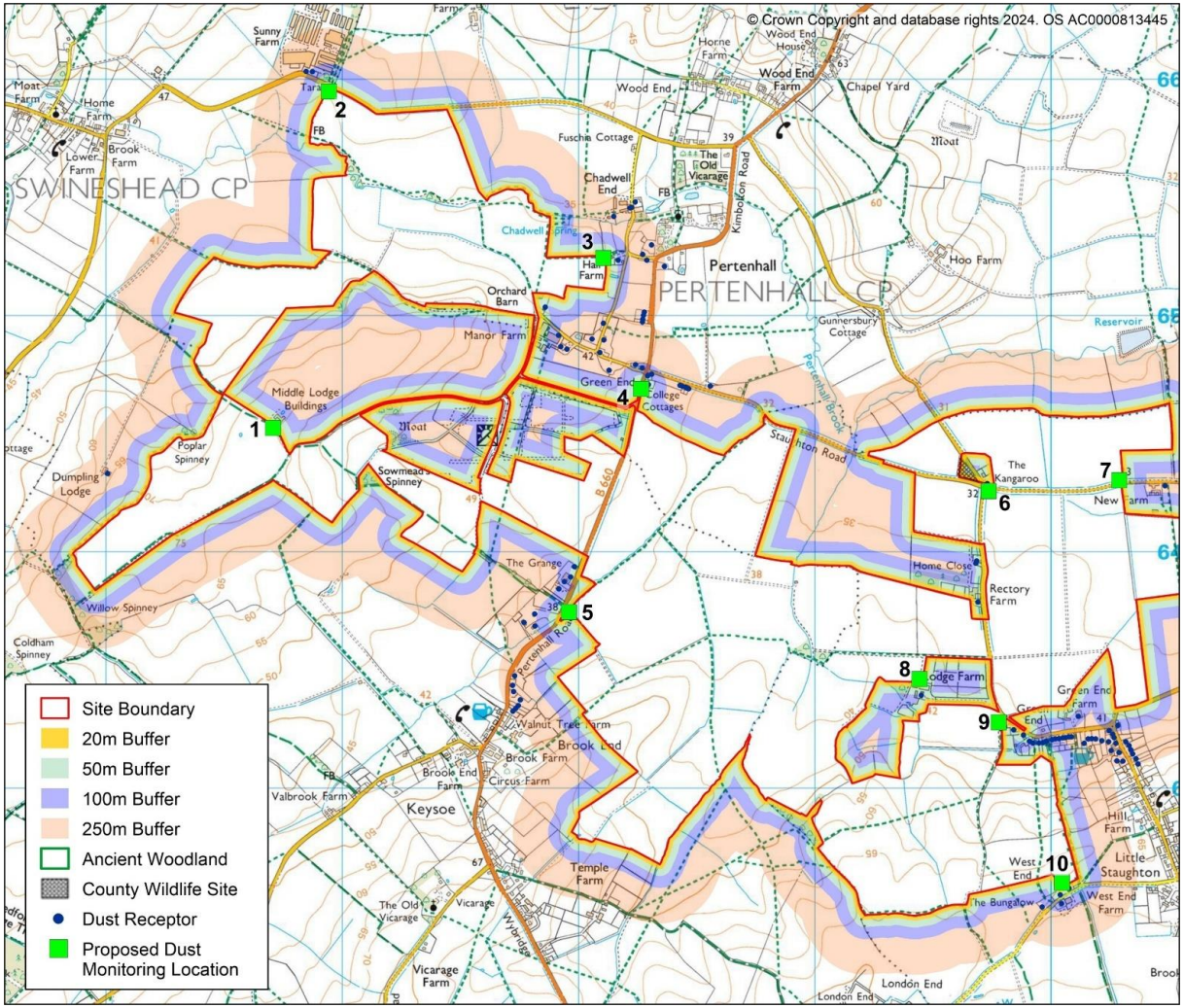
1.5.15 A summary report would be produced on completion of the first 12 months post-baseline monitoring. This would include a review of the monitoring programme, including locations, duration and frequency of on-going monitoring and reporting frequency, taking into account the construction phasing.

1.5.16 Any proposed alterations to the dust monitoring methodology and reporting regime, including locations, duration and frequency, would be submitted in writing to the LPA and agreement obtained from the LPA in writing prior to implementation. This may be carried out either as per the initial 12-month submission, or if necessary due to circumstances during the course of the construction phase.

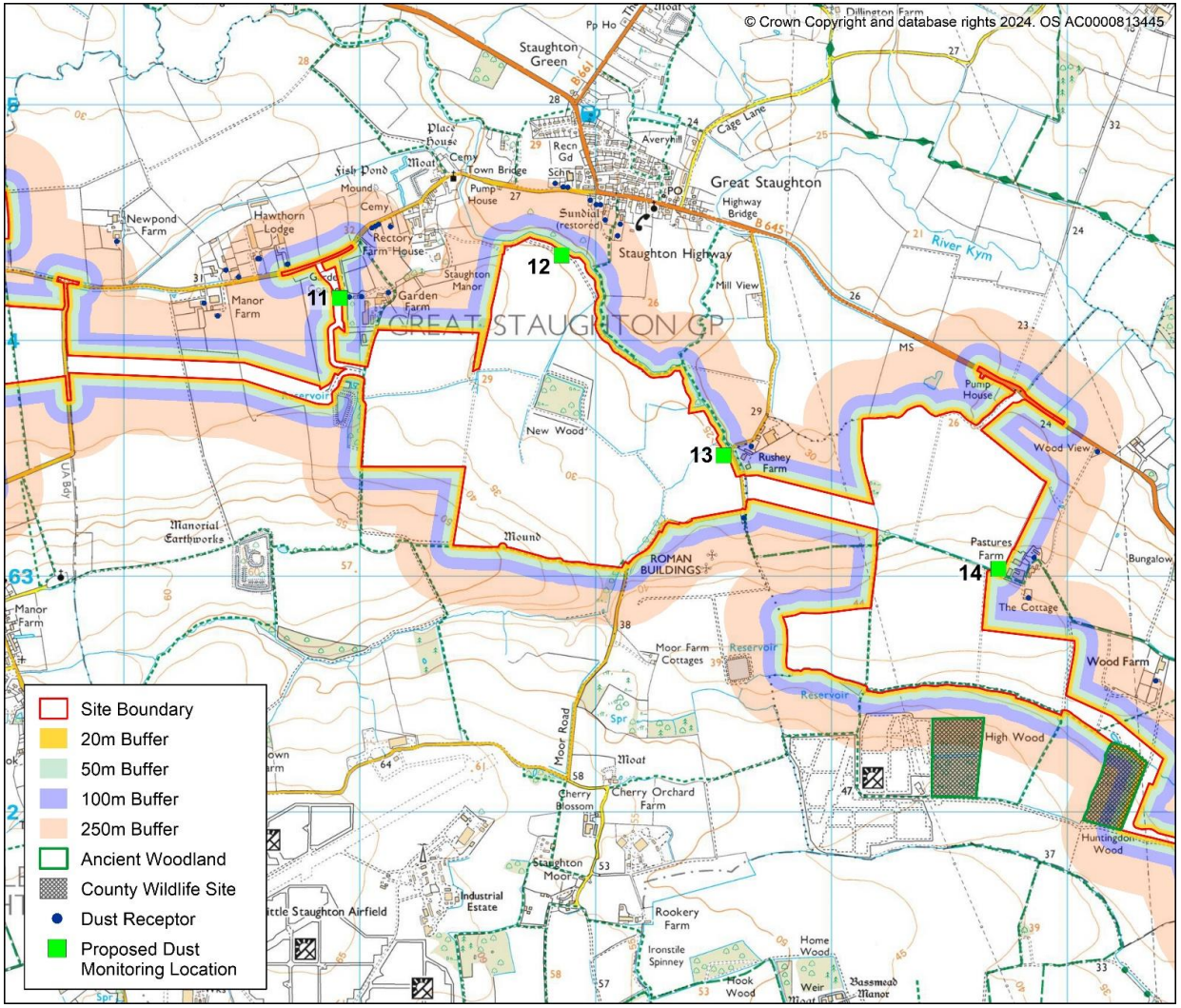
Table 1: Proposed Dust Monitoring Locations

Monitoring Location	Location
DMP1	On boundary of Site A
DMP2	On boundary of Site A
DMP3	On boundary of Site A
DMP4	On boundary of Site B
DMP5	On boundary of Site B
DMP6	On boundary of Site B
DMP7	On boundary of Site B
DMP8	On boundary of Site B
DMP9	On boundary of Site B
DMP10	On boundary of Site B
DMP11	On boundary of access to Site B
DMP12	On boundary of Site C
DMP13	On boundary of Site C
DMP14	On boundary of Site D
DMP15	On boundary of East Park Sub-Station

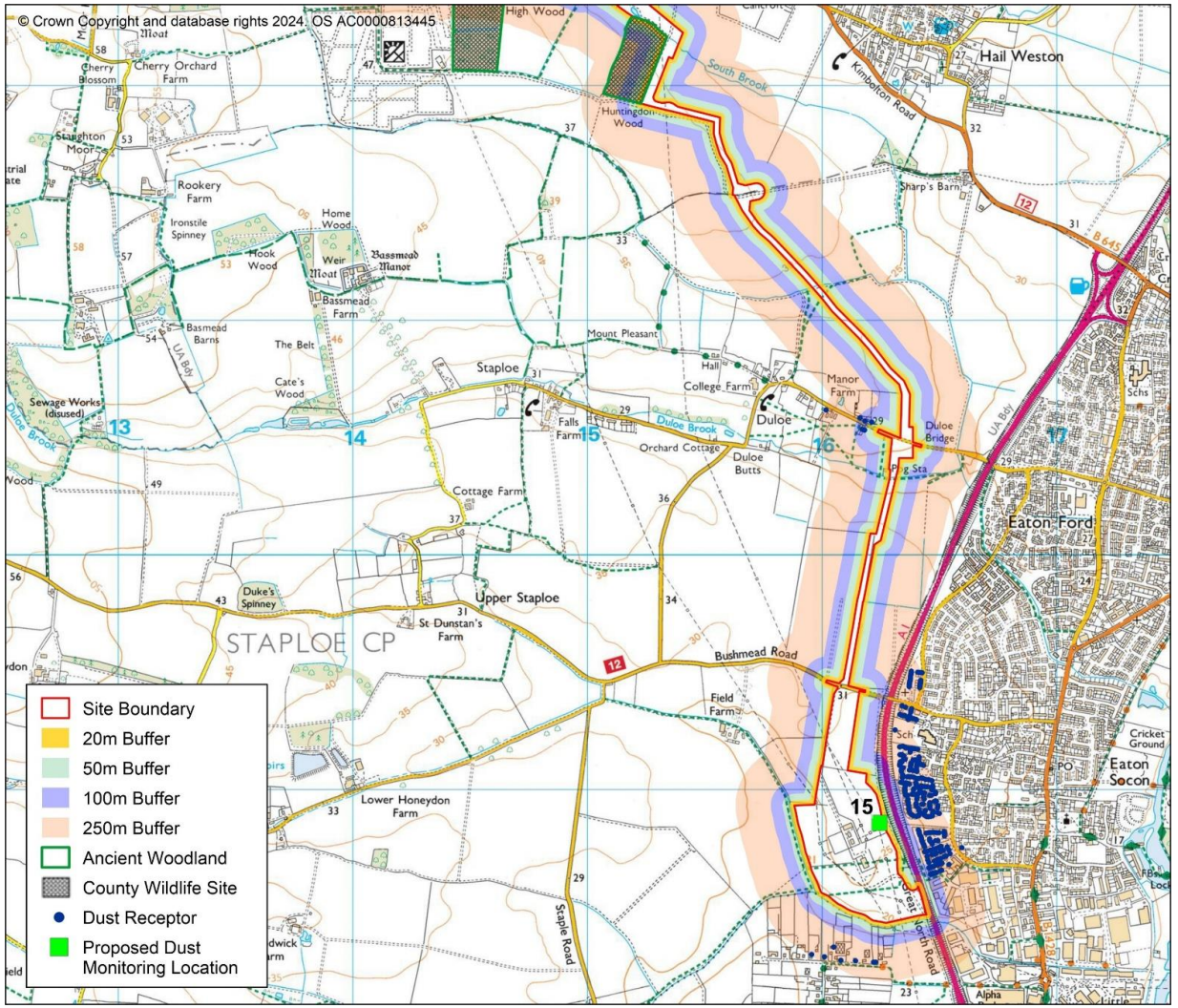
D01: Proposed Dust Monitoring Locations (DMP1 – DMP10)



D02: Proposed Dust Monitoring Locations (DMP11 – DMP14)



D03: Proposed Dust Monitoring Locations (DMP15)


© Crown Copyright and database rights 2024. OS AC0000813445
Site Boundary
20m Buffer
50m Buffer
100m Buffer
250m Buffer
Ancient Woodland
County Wildlife Site
Dust Receptor
Proposed Dust Monitoring Location
STAPLOE CP
Hail Weston
Eaton Ford
Eaton Socon
Staploe
Upper Staploe
Duloe
Bushmead Road
Kimbolton Road
Duloe Brook
South Brook
High Wood
Huntingdon Wood
Home Wood
Hook Wood
Cate's Wood
The Belt
Cherry Orchard Farm
Rookery Farm
Ironstile Spinney
Bassmead Manor
Bassmead Farm
Basmead Barns
Mount Pleasant
College Farm
Manor Farm
Falls Farm
Orchard Cottage
Duloe Butts
Duloe Bridge
Cottage Farm
St Dunstan's Farm
Duke's Spinney
Field Farm
Lower Honeydon Farm
Sharp's Barn
Sewage Works (disused)
Staple Road
Great North Road
Cricket Ground
13
14
15
16
17
15

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Outline Construction Environmental Management Plan

Appendix B: Ecology Reasonable Avoidance Measures Method Statements

Document Reference: EN010141/DR/7.3

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

April 2026

Version P01

EAST PARK ENERGY

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Outline Construction Environmental Management Plan

Appendix B: Ecology Reasonable Avoidance Measures Method Statements

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/7.3
Author:	Avian Ecology Ltd

Version	Date	Status
P01	April 2026	Deadline 1

CONTENTS

1.0 INTRODUCTION

1.1 Background

1.1.1 This document provides outline Reasonable Avoidance Measures (RAMs) Method Statements in relation to ecological receptors found within the Order Limits of the East Park Energy Project (the 'Scheme').

1.1.2 The RAMs contained within this document accompany the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**. Detailed RAMS would form part of any final CEMP(s) produced for any phase of the Scheme and would be informed by pre-construction surveys as detailed within the oCEMP.

1.1.3 The final CEMP(s) produced for any phase of the Scheme will be in substantial accordance with the oCEMP, as set out in a Requirement of the **draft DCO [EN010141/DR/3.1]**, and approved by the relevant local planning authority (LPA) before construction commences.

1.2 Legislation

1.2.1 The purpose of these RAMs is primarily to ensure compliance with relevant nature conservation legislation including:

- The Conservation of Habitats and Species Regulations 2017;
- The Wildlife and Countryside Act 1981 (WCA); and
- Protection of Badgers Act 1992.

1.2.2 Compliance with RAMs will also contribute to the maintenance of the conservation status of relevant species within the Site.

Breeding Birds

1.2.3 Under the WCA it is an offence to:

- Kill, injure or take a bird;

- Take, damage, destroy or interfere with a nest of any bird whilst it is in use or being built;
- Obstruct a nest or prevent its use; and,
- Take or destroy the eggs of any bird.

1.2.4 Certain bird species are afforded additional protection. Species listed under Schedule 1 of the WCA[1] are additionally protected from disturbance whilst building a nest or whilst on or near a nest and have protection from disturbance of their dependant young (which may have left the nest but still be considered "dependant").

1.2.5 A person shall also be guilty of an offence under Part 1 of the WCA 1981 (as amended), if they intentionally or recklessly cause harm by:

- disturbing any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or,
- disturbing dependent young of such a bird.

Bats

1.2.6 All species of British bat are listed under Schedule 5 of the WCA 1981 (as amended). Bats are further protected under the Habitats Regulations. The Regulations make it an offence to:

- Kill, injure or take any wild bat;
- Damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection; and,
- Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.

[1] *List of Schedule 1 species available from: https://www.legislation.gov.uk/ukpga/1981/69/schedule/1*

Otter

1.2.7 Otters are listed under Schedule 5 of the WCA 1981 (as amended), they receive further protection under the Habitats Regulations. The Act and Regulations make it an offence to:

- Deliberately capture, injure or kill an otter;
- Damage or destroy a breeding site or resting place, and;
- Deliberately disturb an otter, particularly in a way which is likely to:
- to impair their ability to survive, breed or reproduce, rear or nurture young; or,
- to affect significantly the local distribution or abundance of the species.

Water Vole

1.2.8 Water voles are protected in England under the provisions of the WCA 1981 (as amended). The species is listed on Schedule 5 of the Act and is protected under Section 9, which makes it an offence to:

- Intentionally kill, take or injure a water vole;
- Possess or control any live or dead water vole or any part or derivative;
- Intentionally or recklessly damage or destroy a water vole's place of shelter or protection;
- Intentionally or recklessly disturb a water vole while it is occupying a structure or place which it uses for shelter or protection; or,
- Intentionally or recklessly obstruct access to a water vole's place of shelter or protection.

1.2.9 It is generally agreed that a place of shelter or protection used by water voles includes a network of activity burrows and/or any nests that have been constructed within the burrow system or above ground amongst dense vegetation.

Hazel Dormouse

1.2.10 Hazel dormice are protected under Schedule 5 of the WCA 1981 (as amended) and the Habitats Regulations. The Act and Regulations make it an offence to:

- Deliberately capture, injure or kill hazel dormice;
- Damage or destroy a hazel dormouse resting place or breeding site;
- Deliberately or recklessly disturb a hazel dormouse while it's in a structure or place of shelter or protection; and/or,
- Block access to structures or places of shelter or protection.

Amphibians and Reptiles

1.2.11 Great crested newt (GCN) and their habitats are protected under the WCA 1981 (as amended) and the Habitats Regulations. The Act and Regulations make it an offence to:

- kill, injure or take a GCN;
- damage, destroy or obstruct access to any place that a GCN uses for shelter or protection; and,
- intentionally or recklessly disturb a GCN while it is occupying a structure or place that it uses for shelter or protection.

1.2.12 Common reptile species namely the common lizard, slow-worm, grass snake and adder are protected against killing, injuring and sale under the WCA 1981 (as amended).

2.0 METHOD STATEMENTS

2.1 Breeding Bird Method Statement

Nest Protection Measures

2.1.1 Vegetation clearance within the nesting bird season (March to August inclusive) will be avoided where reasonably practicable. Any vegetation to be cleared during the nesting bird season must first be checked by the EcoCoW.

2.1.2 Should any active nests be found, works would only proceed under the advice of the appointed EcoCoW with species specific buffer zones to be enforced to prevent damage or disturbance to nests. Where required, advice from Natural England would be sought as to the appropriate buffer to be applied around nests and which, if any, activities may proceed within this buffer. If advice from Natural England cannot be gained in sufficient time, professional judgement of the EcoCoW would be used to determine an appropriate buffer.

2.1.3 Where restrictions on named activities are applied within a protection buffer around a nest, these activities would not proceed whilst the nest remains active, unless otherwise agreed by Natural England and/or the Local Planning Authority.

2.1.4 Removal of an avoidance buffer will require confirmation from the EcoCoW that the nesting attempt is no longer active (i.e. reached conclusion through fledging or failure). This will require a follow up visit(s), with timing to be determined by the nature of the nesting record and ahead of commencement of construction works.

2.1.5 Despite thorough searches, it is possible that some nests may go undiscovered until after work has commenced. In this scenario, works would be stopped immediately and the EcoCoW informed, before implementation of an appropriate buffer zone, as set out above.

Additional Breeding Bird Measures During Construction

2.1.6 The following precautionary measures shall be followed during construction works to minimise impacts on breeding birds:

- Vehicles will observe internal site speed limits whilst on Site;
- Holes, pits and other excavations created as part of construction works will not be left uncovered overnight, or will provide a means of egress for birds/ animals; and,
- EcoCoW to provide ‘toolbox’ talks to all relevant site personnel outlining bird protection risks and required measures and observations for staff to look out for and to report back to the EcoCoW.

2.2 Bat Method Statement

Method Statement Objectives

2.2.1 Trees present within the Site would be retained and protected during construction (in accordance with British Standard (BS) 5837:2012, as set out in **ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2].** However, if as a result of detailed design trees require removal/felling, the trees where works are required would 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.

2.2.2 Any work activities associated with the Scheme, such as tree pruning or removal works for trees with bat roosting suitability (e.g., possessing potential roost features such as cracks, crevices or holes) may potentially impact roosting bats. As a result, and in accordance with Bat Conservation Trust (BCT) guidance (Collins, 2023), precautionary safeguards must be implemented to protect these species and the Method Statement below details measures to be implemented to ensure these objectives are achieved. If these measures are followed, then no impacts are likely to occur.

2.2.3 A tree with PRF-M (i.e. potential roost feature suitable for multiple bats) would require further survey (such as climbing inspections) and assessment and are not included in this Method Statement. If a roost is confirmed in these assessments, a licence would be required from Natural England to destroy/disturb the bat roost.

2.2.4 Works proposed on trees surveyed for bat roost potential that have no potential for roosting bats can proceed without further survey or requirement for the EcoCoW to be present.

Method Statement

2.2.5 In accordance with BCT guidance, a tree with PRF-I potential (i.e. potential roost feature suitable for individual bats) can be removed without the need for

further survey or assessment. Best practice recommends that appropriate roost compensation is provided prior to tree removal and that works are carried out under a Method Statement (as included here) as per the Bat Mitigation Guidelines (CIEEM 2023)[2]. Roost availability would be maintained through the inclusion of a bat box positioned on a suitable nearby retained tree, prior to tree removal. Bat boxes should be durable and long-lasting.

2.2.6 This Method Statement should therefore be followed for any tree work impacting trees which have PRF-Is only, in order to ensure legal compliance and the objectives are achieved. The following measures will be adopted throughout the construction period of the Scheme:

2.2.7 Site operatives (including tree appointed contractors) will be informed by 'tool box' talk of the potential for protected species to occur on-site, what to look out for and what to do in the event that animal is found.

2.2.8 The trees with PRFs that could potentially be affected by works will be shown to the contractors by the EcoCoW with explanation of the roost assessment and proposed working methods.

2.2.9 Pruning works should where possible avoid PRFs. Prior to tree works commencing, the appointed tree contractors should climb and inspect the tree for PRFs, not previously detected and for evidence of bat roosts, where safe to do so.

2.2.10 Trees with PRF-Is should be soft felled in sections and then lowered to the ground and left on Site overnight (not stacked) before removal. Typically, PRF's would first be internally inspected with an endoscope, removed in one whole section (avoiding cutting the PRF into two) then left on the ground with PRF facing upwards until at least the next day, so any potential bat within a crevice has the chance to leave overnight. If a bat is encountered during any

[2] *Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute and Environmental Management, Ampfield.*

part of the process, it can be safely removed and placed in the aforementioned bat box by a suitably licenced ecologist.

2.2.11 If bats are found to be roosting within any tree, works must cease immediately on that tree. Further consideration would be required, and the data gathered would be used to inform potential design amendments avoiding or reducing impacts, or, failing that, to support a licence application to Natural England to destroy/disturb the bat roost.

2.3 Amphibian and Reptile Method Statement

Summary of Method Statement

2.3.1 Great crested newts have been found to be present in ponds adjacent to the Site. The following Method Statement outlines suitable measures to be implemented during construction works to avoid the potential for disturbance, injury or killing of individual great crested newt. All works should adhere to the Scheme specific European Species Mitigation Licence method statement.

2.3.2 Measures to ensure the favourable conservation status of the species during the Scheme must reflect legislation and guidance application at the time and the construction phase will be undertaken following RAMs under the supervision of the EcoCoW as required to provide advice.

2.3.3 Vegetation clearance works that may include removal of small areas of hedgerow and scattered scrub, as well as tall herb and grasslands greater than 15cm in height, will be supervised by a suitably licensed ecologist and/or accredited agent.

Method Statement

2.3.4 This Method Statement will be followed for the construction works and associated minor short-term destructive habitat clearance works within the Site in order to ensure legal compliance and to ensure the objectives are achieved.

2.3.5 The following measures will be adopted throughout the construction period of the Scheme:

- Site operatives will be informed by ‘toolbox’ talk of the potential for protected species to occur on-Site, what to look out for and what to do in the event that an animal is found.
- Vegetation clearance works will only commence after a careful visual inspection by an EcoCoW has determined that no animals are present.

- Vegetation clearance will be undertaken following a two-stage cut whereby vegetation will be reduced (by hand strimmer) to a height of c.150mm prior to ground works commencing to aid visual searches by the EcoCoW and encourage individuals to temporarily move away from the working areas. Only then can vegetation be reduced to ground level where it should be maintained.
- The proposed timing of the works should avoid the hibernation period (November to February inclusive) in order to prevent disturbance to hibernating animals including reptiles (and hedgehogs).
- Trenches and excavations will include an escape route for animals that might enter the trench, especially if left open overnight. Ramps should be no greater than 45 degrees in angle and can include wooden planks or ramped earth. Any excavations open for a prolonged period will be covered.
- All excavations left open overnight or longer will be checked for animals prior to the continuation of works or infilling.
- Any excavated material stored overnight will be searched prior to being used as infill.
- Any brash cut down from the Site should be placed in piles within the set aside habitat area, to create additional hibernacula for both amphibian and reptile species.
- Stored Materials to kept on pallets raised off the ground to discourage use as a refuge.
- Site specific management practices as set out within the oCEMP (and subsequent final CEMP(s) must be adhered to during construction to ensure the protection of habitats and species within the Site.

2.3.6 Should a reptile or other notable species (such as hedgehog) be found at any point during construction, works within suitable habitat and/or potentially disturbing works in close proximity to the animal must cease immediately and the EcoCoW will advise on the appropriate actions, including applying for a licence, if required

2.4 Otter and Water Vole Method Statement

Summary of Method Statement

2.4.1 Any development related activities on the Site, such as works required in or within 5m of a ditch/watercourse may potentially affect these species. This includes proposed works associated with crossings and culverts. As a result, safeguards must be implemented to protect these and other species, and the Method Statement below details measures to be implemented to ensure these objectives are achieved. If these measures are followed, then no impacts are likely to occur.

Method Statement

2.4.2 This Method Statement should be followed for small scale works in or within 10m of a ditch and/or watercourse to ensure legal compliance and that the objectives are achieved.

2.4.3 The following measures will be adopted throughout the construction period of the Scheme:

- The developer, Site contractor or their representatives will appoint a suitably qualified EcoCoW to oversee works completed under this Method Statement for the duration of the construction period.
- A pre-construction water vole and otter survey will be carried out if small scale, localised works are required in or within 10m of a ditch or watercourse. If the pre-construction survey were to confirm presence of otter or water vole in the vicinity of the proposed works a licence may be required if disturbance cannot be avoided.
- Site operatives will be informed by a 'toolbox' talk of the potential for water vole and otter species to occur on-Site, what to look out for and what to do in the event that animal is found. The toolbox talk will be provided by the EcoCoW.
- The EcoCoW will be present during all works considered to require advice and an ecological watching brief. The EcoCoW will be contactable by the

Site Manager at all other times and available to further advise on Site, if necessary, as a contingency measure.

- Works to be carried out in or within 10m of a ditch/watercourse must only commence after a careful visual inspection by the EcoCoW has determined that no animals or their burrows/holts are present. Vegetation will be reduced to a height of no less than 150mm prior to works commencing to aid visual searches. The EcoCoW will then search the areas prior to the vegetation being taken back to ground level / bare ground.
- Should evidence (or potential evidence) of water vole or otter be found at any point during construction, works within suitable habitat and/or potentially disturbing works in close proximity must cease immediately and the EcoCoW will advise on the appropriate actions, including applying for a licence, if required.
- No tools, vehicles, or materials will be stored within 10m of watercourses/ditches and stand-off buffers will be clearly marked by fencing (or similar), with appropriate signage.
- Should any trenches and excavations be left open, particularly overnight, an escape route for animals that enter the trench must be provided. Ramps should be no greater than 45 degrees in angle. Ideally, any holes should be covered.
- If left open, then excavations left open overnight or longer will be checked for animals prior to the continuation of works or infilling.

2.4.4 If an otter or water vole (or evidence of either species) is found, work must stop immediately, and contact should be made with the EcoCoW.

2.5 Hazel Dormouse Method Statement

Summary of Method Statement

2.5.1 Any clearance of habitats potentially suitable for hazel dormouse (hedgerow and woodland) will be carried out by hand or light machinery using the 'persuasion' approach (Bright *et. al.*, 2006[15]) and under the direct supervision of a suitably licensed ecologist and/or accredited agent.

Search and Habitat Clearance

2.5.2 Prior to habitat clearance commencing in suitable hazel dormouse habitats, a detailed inspection of all such vegetation to be removed/impacted will be undertaken by the EcoCoW in order to ensure no hazel dormice are present. Clearance of small sections (Less than 10m) of hedgerow for example is not likely to affect dormice in any way but should be first checked by the EcoCoW. Areas greater than 50m that may require more detailed survey and advice should be sought from the EcoCoW before removal.

2.5.3 Potential impacts of killing and injury during site clearance will be mitigated using the 'persuasion' approach (Bright *et al*, 2006[3]). This approach is normally adopted where:

- Less than 100m of hedgerow will be removed – as long as the remaining habitat is linked to a larger potential dormouse habitat.
- Less than a 50m wide strip of woodland will be removed – as long as the remaining habitat is linked to a larger dormouse habitat.

2.5.4 Clearance in Winter

2.5.5 A two-stage approach will be adopted for vegetation clearances during winter months (November to March, depending on conditions locally).

[3] *Bright, P.W, Morris, P.A. & Mitchell-Jones, A. (2006) Dormouse Conservation Handbook: Second Edition. English Nature, Peterborough.*

2.5.6 This will include for the clearance of sufficient vegetation, to persuade dormice emerging from hibernation in April or May to move to more optimal habitats nearby. Clearance during this period will seek to largely avoid the breeding bird season and the period when dormice might be found in above ground nests

2.5.7 All clearance will be undertaken by an appointed contractor under the supervision of a suitably licence ecologist and/or accredited agent, using hand tools or light machinery, and will be sensitive to the likelihood of disturbing or killing hibernating dormice. Hedgerows and trees will be gradually reduced to stump level, with all cut brash placed into piles at suitable locations around the Site, as directed by the ecologist to provide habitat for invertebrates and small mammals. Larger material may be logged into approximately 2m lengths and piled to provide wildlife habitat (including summer and winter nest sites for dormice).

2.5.8 Once adult emergence is complete (usually by end of May), full clearance of stumps and root networks will then continue.

2.5.9 Clearance in Summer

2.5.10 Summer clearance (April to October, depending on conditions locally) is suitable for small areas of dormouse habitats.

2.5.11 All clearance will be undertaken by an appointed contractor under the supervision of the EcoCoW, using hand tools or light machinery, and will be sensitive to the likelihood of disturbing or killing nesting dormice and separating females from dependent young.

2.5.12 Prior to the start of clearance, a detailed inspection of all vegetation to be removed will be undertaken to seek to identify potential nesting sites. Only when the EcoCoW is confident that no dormouse nest is likely to be present will works commence. Hedgerows and trees will be gradually reduced in height to stump level; once reduced to stump level, the remaining stumps and root network will be removed using a staged technique.

2.5.13 All cut brash will be placed into piles at suitable locations around the site, as directed by the EcoCoW to provide habitat for invertebrates and small mammals. Larger material may be logged into approximately 2m lengths and piled to provide wildlife habitat (including summer and winter nest sites for dormice).

2.5.14 Site operatives will be informed by a 'tool box', which will detail the potential for protected species to occur on-Site, what to look out for and what to do in the event that animal is found.

2.5.15 If a hazel dormouse is found during site clearance or construction periods, works must stop immediately, and contact should be made with a suitably qualified/licenced ecologist for advice. Further works potentially affecting dormice would require a European Protected Species Mitigation Licence to legally proceed.

2.6 Badger Method Statement

Summary of Method Statement

2.6.1 Given the existing baseline levels of disturbance from agricultural practices, the short timescales of works in any given locality, and taking into account Natural England guidance, it is not considered that fencing or panel installation works beyond 20m from a sett would result in disturbance to badger beyond a trivial level, and would not require a licence.

2.6.2 A 20m buffer (30m for large, tracked machinery) would be maintained from active badger setts set out with Heras fencing or similar, with no works to be undertaken within this area unless covered under a specific method statement and agreed by the EcoCoW. Specific method statements would be set out within the final CEMP(s) and informed by pre-construction survey.

Method Statement

2.6.3 The following general mitigation measures will be adopted throughout the construction phase of the development:

- Any areas of soil to be stored for any period of time will be fenced to deter use by badgers and/or checked daily by site staff to ensure no attempted creation of new setts by badgers (soil bunds hold great potential for sett creation). The appointed ecologist will be contacted to undertake an assessment if necessary;
- No trenches/excavations will be left open overnight without the creation of sloping escape ramps for badgers, which may be achieved by edge profiling of trenches/excavations or by using planks placed into them at the end of each working day;
- Chemicals will be stored safely away from setts;
- Open pipe-work larger than 150mm outside diameter will be blocked off at the end of each day; and,

- No works will take place between sunset and dawn (i.e. no night time working) and security lighting (if used) will not be directed towards any of the setts.

2.6.4 Badger are a mobile species and new holes could be opened up in a short period of time. If any badger holes are observed, works in that area should stop and further advice sought from the EcoCoW.

APPENDIX C: OTHER PLANS TO FORM PART OF THE FINAL CEMP

Appendix C: Other plans to form part of the final CEMP

The following plans referenced in this oCEMP will be prepared and incorporated into the final CEMP, either within its main body or as appendices, as appropriate:

- **Communications Strategy**;
- **Construction Dust Management and Monitoring Plan**;
- **Construction Noise Monitoring Plan**;
- **Ecological Reasonable Avoidance Measures**;
- **Emergency Response Plan**;
- **Environmental Incident Management and Pollution Prevention Plan**;
- **Fish Rescue Plan**;
- **Flood Warning and Evacuation Plan**;
- **Frac-Out Contingency Plan**;
- **Ground Investigation Report**;
- **Invasive Non-Native Species Management Plan**;
- **Lighting Strategy**;
- **Peat Management Plan**;
- **Supply Chain Carbon Reduction Plan**;
- **Unexpected Contamination Protocol**;
- **Unexploded Ordnance Management Plan**; and
- **Watercourse and Groundwater Quality Monitoring Plan**.

The purpose of each of these documents is set out in the Table below.

Document	Purpose
Communications Strategy	A Communications Strategy will form part of the final CEMP to define how the Principal Contractor will communicate with local residents, businesses, parish councils, community groups, regulatory bodies and other third parties before and throughout construction. The Strategy will ensure that stakeholders receive timely and accessible information about construction progress, forthcoming activities and changes to the programme, and that

	enquiries and complaints are received, investigated and addressed through clearly defined procedures. The Communications Strategy will include: • Roles, responsibilities and contact details, including the Community Liaison Officer and escalation routes; • Stakeholder contact schedule and proposed communication methods; • Detail about the establishment of the Community Liaison Group; • Detail of how and when updates on construction progress, programme changes, large-load movements, road works and other relevant activities will be communicated; • Detail about the project website, contact telephone number, including an out-of-hours number, postal contact address and site information boards; • Detail of the procedure for receiving, acknowledging, investigating and responding to enquiries and complaints; • Detail about the setup, maintenance and review of a Complaints Register, including how actions will be taken; and • Detail about record keeping, how recurring issues will be reviewed, and how corrective action and reporting to the relevant LPA will be undertaken.
Construction Dust Management and Monitoring Plan	A Construction Dust Management and Monitoring Plan (CDMMP) will form part of the final CEMP, and will be prepared in substantial accordance with the outline CDMMP submitted at Appendix A of the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.
Construction Noise Monitoring Plan	A Construction Noise Management Plan (CNMP) will form part of the final CEMP to set out the site-specific controls, monitoring and communication measures that will be used to manage construction noise and, where relevant, vibration at residential and other noise-sensitive receptors, public rights of way and equestrian land uses. The CNMP will apply best practicable means, including the principles of BS 5228, to minimise disturbance throughout construction. The CNMP will include: • Detail about plant and noise-sensitive receptors to which the controls apply; • Detail about the applicable noise and vibration criteria; • Best practicable measures, including plant selection and maintenance, silencers or acoustic hoods, switching off plant when not in use, broadband reversing alarms, appropriate routing and maximising separation from receptors; • Detail about any temporary screening or hoarding and appropriate controls for piling and other potentially significant activities;

	• Measures for equestrian receptors, including advance warning signage, stop-and-hold procedures, pausing non-essential noisy activities, equestrian sensitivity zones and the method of providing advance notification of short-term higher-noise works; • Detail about a noise and vibration survey and monitoring methodology, locations and frequency; and • Procedures for recording results, investigating complaints or potential exceedances, and implementing corrective action.
Ecological Reasonable Avoidance Measures	Ecological Reasonable Avoidance Measures will form part of the final CEMP to set out detailed, species-specific working methods to avoid or reduce the risk of killing, injury, disturbance or damage to protected and notable species and their habitats during construction. The detailed measures will be informed by the results of pre-construction surveys and will support compliance with relevant nature conservation legislation and the maintenance of the conservation status of the species concerned. The Ecological Reasonable Avoidance Measures will be in substantial accordance with those submitted at Appendix B of the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**. This will include: • Detail about relevant legislation, ecological responsibilities and the role of the Ecological Clerk of Works; • Detail about species-specific method statements for breeding birds, bats, amphibians and reptiles, otter and water vole, hazel dormouse and badger; • Detail about (or the results of) pre-construction surveys, checks and ecological watching briefs; • Detail about seasonal working restrictions, species-specific exclusion buffers and licensing triggers; • Detail about precautionary working methods, including staged vegetation clearance, hand searches, protection of refuges and escape arrangements for open excavations; • Detail about site inductions and toolbox talks for relevant personnel; and • Detail about stop-work and escalation procedures where protected species, nests, burrows, setts, holts or other evidence are encountered, together with monitoring and record-keeping requirements.
Emergency Response Plan	An Emergency Response Plan (ERP) will form part of the final CEMP and Battery Safety Management Plan (BSMP) to set out the coordinated, site-specific procedures for responding to incidents and emergencies during construction, including emergencies associated with the delivery, installation, testing and commissioning of the BESS. The ERP will set out measures to protect site personnel, first responders, the public and the environment by defining emergency roles, communications, access, evacuation, shutdown, firefighting, pollution-control and recovery arrangements. It will be developed in consultation with the relevant local authority emergency planning officers, emergency services, including

	relevant fire and rescue services, the police, the East of England Ambulance Service, and the Environment Agency, and will be shared with the appropriate emergency services before construction begins. The ERP will include: • Detail on the scope of the ERP, Site description, relevant construction activities, personnel and working hours, and the credible emergency scenarios to be addressed; • Detail on emergency roles, responsibilities and contact details, including the emergency response coordinator, BESS subject matter expert, relevant emergency services and regulatory bodies, and 24-hour contact and control arrangements where applicable; • Detailed about trained first-aid provision, first-aid locations and Automated External Defibrillators (AEDs), emergency access, incident escalation procedures, casualty handover and potential helicopter access locations; • Procedures covering the four stages of incident response: discovery; initial response and notification; incident actions; and resolution and post-incident actions, including reporting and escalation arrangements; • Site and emergency plans showing access and egress points, internal roads, agreed emergency routes, observation and turning areas, alarms, emergency isolators, dangerous goods, firefighting facilities and water supplies, and drainage and firewater-containment systems; • Detail on emergency-service access, site evacuation and escape procedures, emergency signage and notices, site inductions, training drills and emergency-service familiarisation, with relevant information available digitally and in hard copy on Site; • Detail on BESS-specific detection, alarm, emergency shutdown, electrical isolation and de-energisation procedures, together with the defensive firefighting and boundary-cooling strategy to be agreed with CFRS; • Detail on the environmental response procedures, including drainage isolation, containment and testing of firewater before controlled release or off-site treatment, and priority notification of the Environment Agency and relevant downstream receptors where controlled waters could be affected; • Detail of the BESS pre-delivery and pre-energisation hold points confirming that emergency access, commissioned firefighting water supplies, operational firewater containment, emergency equipment, communications, signage and response procedures are in place before battery equipment is delivered, and that integral fire-safety systems are tested before energisation; • Detail about proportionate off-site protection measures informed by the detailed-design plume analysis, including public or resident notifications and liaison regarding transport infrastructure where necessary; and

	• Detail about procedures for post-incident recovery arrangements addressing the potential for reignition, fire-watch requirements, de-energisation, replenishment of firefighting water, removal and disposal of damaged equipment, incident review and prompt circulation of any revisions to the ERP.
Environmental Incident Management and Pollution Prevention Plan	A Environmental Incident Management and Pollution Prevention Plan (EIMP) will form part of the final CEMP to define the measures that will be implemented to prevent pollution and provide a structured response to environmental incidents, including fuel or chemical spills, unexpected contamination and releases of polluted or sediment-laden water. The EIMP will protect surface water, groundwater, watercourses, soils and other sensitive receptors and establish clear arrangements for reporting, investigation and remediation. The EIMP will include: • Detail about roles, responsibilities, emergency contacts and notification or escalation arrangements; • The identification of sensitive receptors and the locations of spill kits and other containment equipment; • Detail about pollution prevention controls for fuel, oil and chemical storage, refuelling, plant operation, concrete and cement-based materials, washout areas, dewatering and contaminated run-off; • Detail about procedures for responding to, containing and cleaning up spills, releases and other environmental incidents; • Detail about arrangements for notifying relevant regulatory authorities and emergency services where required; • Detail about environmental incident response training as part of site induction and toolbox talks for relevant staff; and • Detail about monitoring and sampling requirements, together with an incident and near-miss register recording causes, effects, remedial measures, corrective action and the effectiveness of the response.
Fish Rescue Plan	A Fish Rescue Plan (FRP) will form part of the final CEMP to set out the measures for the safe removal, handling and relocation of fish and other aquatic life where dewatering is required for a dry watercourse crossing or similar construction activity. The FRP will minimise the risk of injury, mortality or entrainment and ensure that dewatering works are undertaken in an environmentally appropriate manner. The FRP will include: • Detail about the works and watercourse sections to which the FRP applies; • A pre-dewatering inspection and fish-rescue methodology, including electric fishing and/or fine-mesh seine netting where appropriate; • Detail about procedures for the safe handling and relocation of fish, including juveniles, eels and other aquatic life;

	• Detail about the use of fish-safe meshes and 2 mm aperture screens on pumps to prevent the entrainment of elvers and glass eels; • A dewatering methodology and controls for the discharge or management of abstracted water; • Detail about monitoring of water pH and siltation, together with the pollution and run-off controls required by the CEMP; and • Detail about monitoring, reporting and record-keeping arrangements.
Flood Warning and Evacuation Plan	A Flood Warning and Evacuation Plan (FWEP) will form part of the final CEMP to manage the residual risk of flooding to construction personnel by establishing arrangements for flood preparedness, receipt and communication of flood warnings, cessation or rescheduling of affected works, and evacuation and emergency response in the event of flooding or extreme weather. The FWEP will include: • Identification of the areas and construction activities potentially affected by flooding; • Detail about roles, responsibilities and contact details, including appointment and duties of the Flood Warden; • Detail about daily review of weather forecasts and arrangements for receiving Environment Agency flood warnings and alerts; • Detail about flood warning levels or other triggers and procedures for communicating warnings to site personnel; • Detail about procedures for rescheduling, suspending or stopping works in affected areas in advance of a flood event; • Detail about site-specific evacuation and emergency response arrangements; • Detail about liaison arrangements with the Environment Agency and other relevant emergency planning bodies; and • Detail about recording warnings and flood events, actions taken and the effectiveness of the response, with procedures for the FWEP to be reviewed following an event where necessary.
Frac-Out Contingency Plan	A Frac-Out Contingency Plan (FOCP) will form part of the final CEMP to prevent, detect and manage any inadvertent release of bentonite or other drilling fluid during horizontal directional drilling works. The FOCP will establish crossing-specific controls to protect ground, controlled waters, habitats, utilities, highways and other sensitive receptors and provide an immediate and coordinated response should a frac-out occur. The FOCP will include: • Identification of all horizontal directional drilling crossings; • Crossing-specific risk assessments of sensitive receptors;

	• Detail about horizontal directional drilling design and methodology, drilling-fluid management and preventative measures; • Detail about monitoring during drilling for surface seepage, unexplained fluid loss and pressure changes; • Detail about response procedures, including stopping or reducing drilling-fluid pressure, notification, and isolating the affected area; • Detail about containment measures and the equipment that must be available before drilling begins, including pumps, vacuum tankers, booms, sandbags, straw bales and silt fencing where appropriate; • Detail about recovery, clean-up, recycling and controlled disposal procedures for drilling fluid and bentonite, including bunded storage at launch and reception locations; and • Detail about communication and reporting arrangements with relevant environmental regulators.
Ground Investigation Report	A Ground Investigation Report (GIR) will form part of the final CEMP to report the findings of the pre-construction site investigation and provide the ground-condition, contamination and groundwater information required to inform detailed design and construction. The GIR will include a Piling Risk Assessment informed by the investigation and will determine whether shallow groundwater is present and a groundwater-monitoring programme is required. The GIR will include: • Detail about the methodology and survey locations of the pre-construction site investigation; • Results of ground conditions, made ground and investigation or sampling results; • Groundwater conditions, including confirmation of whether shallow groundwater is present; • Assessment of potential contamination and its implications for detailed design and construction; • Detail of the Piling Risk Assessment, including its conclusions and any resulting construction controls; • Detail about the requirement for groundwater monitoring, where triggered by the investigation; • Conclusions and recommendations that have informed the final CEMP, Unexpected Contamination Protocol, Watercourse and Groundwater Quality Monitoring Plan, Peat Management Plan, and other relevant construction documents.
Invasive Non-Native Species Management Plan	A Invasive Non-Native Species Management Plan (INNSMP) will form part of the final CEMP to identify and manage invasive non-native species within the Site and prevent their spread during construction. The INNSMP will set out the avoidance, treatment, soil-management, monitoring and long-term control

	or eradication measures required for any invasive species identified before or during the works. The INNSMP will include: • The results of a pre-construction botanical invasive-species walkover survey undertaken between May and October; • Identification, mapping and demarcation of areas containing invasive non-native species; • Detail about restrictions on access or works within affected areas unless approved by the Ecological Clerk of Works; • Detail about species-specific treatment methods to be implemented by a licensed and experienced invasive-species contractor; • Detail about controls for the excavation, movement, storage and disposal or reuse of affected soil and materials; • Detail about long-term eradication or control programme. • Detail about toolbox talks and site-awareness measures for contractors. • Detail about procedures for monitoring of the measures implemented.
Lighting Strategy	A Lighting Strategy will form part of the final CEMP to define the temporary construction lighting required for safe working, access, welfare and security while minimising sky glow, glare and light spill affecting nearby residents, amenity users and sensitive ecological receptors. The Lighting Strategy will include: • Detail about lighting requirements, locations, equipment and operating arrangements for construction compounds and mobile task lighting; • Identification of sensitive residential, amenity and ecological receptors, updated where necessary following pre-construction surveys; • Controls on the hours and circumstances in which lighting may be used, generally not exceeding one hour either side of the specified construction working hours; • Detail about the use of task-specific lighting, directional fittings and appropriate positioning to minimise outward light spill and glare. • Lux Plans for site compounds showing the predicted 0.2, 0.5, 1, 5 and 10 lux contours. • Detail about measures to direct lighting away from woodland, hedgerows, ponds, watercourses, trees, badger setts and other sensitive habitats. • Detail about monitoring procedures.
Peat Management Plan	A Peat Management Plan will form part of the final CEMP only where surface-level or other peat capable of being affected by the Scheme is identified through further ground investigation. Its

	purpose will be to set out the measures required to avoid or minimise impacts on the identified peat. The Peat Management Plan will include: • The findings of the relevant ground; • Identification of the location and extent of peat potentially affected by the works; • Identification of construction activities capable of affecting the peat; • Detail of design and working measures to avoid or minimise impacts; • Detail of specific working methods for any impacts that cannot reasonably be avoided; and • Detail of a stop work protocol should peat be discovered unexpectedly following the ground investigation, along with a reporting mechanism with the relevant local planning authority.
Supply Chain Carbon Reduction Plan	A Supply Chain Carbon Reduction Plan (SCCRP) will form part of the final CEMP to collate and coordinate the carbon-reduction measures to be implemented by the Principal Contractor and members of the supply chain, where feasible, and to reduce construction greenhouse gas emissions associated with plant, fuels, materials, products, transport and procurement. The SCCRP will apply the carbon-reduction hierarchy and establish measures and benchmarks against which performance can be monitored. The SCCRP will include: • Roles and responsibilities of the Principal Contractor and relevant suppliers, including supply-chain carbon-reduction commitments where feasible; • Detail of plant and machinery efficiency measures, including planned maintenance, and compliance with relevant emissions standards; • Consideration of certified HVO or other sustainable low-carbon fuels where compatible and reasonably practicable; • Application of the carbon-reduction hierarchy by avoiding unnecessary material use, reducing quantities, waste and transport, and substituting lower-carbon alternatives; • Consideration of embodied carbon within procurement and selection of lower-carbon or locally sourced materials where reasonably practicable; • Consideration of efficient foundations and mounting systems, modular or prefabricated components, reduced concrete and steel quantities, lower-carbon concrete or cement substitutes, recycled-content metals, reusable temporary works and efficient material logistics; • Defined measures and benchmarks for embodied carbon and recycled content; and • Monitoring and recording of selected products and materials against those benchmarks.

Unexpected Contamination Protocol	An Unexpected Contamination Protocol (UCP) will form part of the final CEMP to establish the procedures to be followed where previously unidentified contamination is encountered during or prior to construction. The UCP will ensure that affected works are stopped, the contamination is investigated and risk-assessed, the relevant LPA (and the Environment Agency) is informed, and any necessary remediation is implemented and verified. The UCP will include: • Detail about the maintenance of a documented watching brief for unexpected contamination; • Detail about indicators or circumstances that trigger the UCP; • Detail about the procedure for an immediate cessation of works within the identifiable bounds of the affected area and measures to secure or delineate it; • Detail about the procedure to inform the relevant LPA and Environment Agency; • Detail about the procedure to appoint an appropriately qualified contaminated-land specialist; • Detail about the approach to inspect, sample, analyse and risk assess the suspected contamination; • Detail about the preparation and implementation of a Remediation Strategy where remediation is required; • Detail about the preparation of a Verification Implementation Plan setting out the verification sampling, evidence and acceptance requirements; and • Detail about monitoring and records of the investigation, remediation, and verification.
Unexploded Ordnance Management Plan	An Unexploded Ordnance Management Plan (UXOMP) will form part of the final CEMP to identify the controls, surveys, awareness measures and specialist-response arrangements required to manage the potential presence of unexploded ordnance and allow intrusive construction activities to proceed safely. The UXOMP will be informed by the UXO Detailed Desk Based Study contained within Appendix E of **ES Vol 2 Appendix 12-1 Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]**. The UXOMP will include: • Identification of the parts of the Site and intrusive activities subject to unexploded-ordnance controls; • Site-specific unexploded-ordnance awareness briefings for all operatives undertaking intrusive works; • Detail about intrusive magnetometer surveys of pile locations and excavations within the areas identified by the Plan, extending to the maximum bomb-penetration depth. • Detail about procedures for reporting and responding to suspicious objects.

	• Detail about communication and escalation arrangements. • Detail about monitoring and reporting of any suspicious objects or incidents encountered.
Watercourse and Groundwater Quality Monitoring Plan	A Watercourse and Groundwater Quality Monitoring Plan will form part of the final CEMP to establish baseline water-quality conditions and provide a structured programme of visual assessment and quality testing before, during and following construction, so that any construction-related change can be identified and addressed. The groundwater component will be required where shallow groundwater is identified through the ground investigation. The Watercourse and Groundwater Quality Monitoring Plan will include: • Detail of the scope and methodology agreed with the relevant LPA and Environment Agency; • Detail of monitoring locations, including locations upstream and downstream of surface-water outfalls and watercourse crossings; • Detail of baseline monitoring commencing at least six months before construction, undertaken monthly; • Detail of the procedure for visual assessments and water-quality testing, with parameters, sampling and analytical methods; • Detail of procedure for monthly monitoring during construction, with increased frequency at and downstream of key activities such as significant earthworks where necessary; • Detail of routine observations of watercourses and drainage controls, supported by daily record keeping where required; • Detail of monitoring continuing through the first six months of operation; • Detail of a groundwater-monitoring programme, where shallow groundwater is identified, prepared in accordance with LCRM and appropriate British Standards and agreed before construction; • Detail of approach to reporting, review of results and procedures for investigation and corrective action where adverse changes are identified.