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Bramford to Twinstead Reinforcement

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Contents

1.	Introduction	1
1.1	Summary	1
1.2	Project Overview	1
1.3	Relevant Policy and Guidance	2
1.4	Purpose of the MWMP	3
1.5	Structure of the MWMP	3
2.	Project Description	5
2.1	Project Commitments	5
2.2	Designing Out Waste	5
2.3	Consents, Licences and Permits	6
2.4	CL:AIRE	6
2.5	Targets for Material Management and Waste Reduction	9
3.	Project Team Roles and Responsibilities	10
3.1	Environmental Management Systems	10
3.2	Project Responsibilities	10
3.3	Duty of Care	11
3.4	Information Training and Awareness	11
4.	Engagement on the MWMP	12
4.1	Introduction	12
4.2	Engagement	12
4.3	Feedback on the MWMP	12
5.	Material Management	14
5.1	Introduction	14
5.2	Efficient Material Use During Construction	14
5.3	Efficient Water Consumption During Construction	15
5.4	Efficient Energy Use During Construction	15
6.	Waste Management	17
6.1	Introduction and Definitions	17
6.2	The Waste Hierarchy	17
6.3	Regional Waste Management Facilities	18
6.4	Waste Management During Design and Construction	18
6.5	Handling and Disposal of Waste During Construction	20
6.6	Waste Management Records and Handling	22

7.	Implementation	24
7.1	Implementing the MWMP	24
7.2	Site Checks and Reporting	24
7.3	Non-Compliance Procedure	25
7.4	Change Process	25

References	27
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Table 1.1 – Structure of the MWMP	4
Table 2.1 – Examples As to How Waste Has Been Designed Out on the Project	5
Table 3.1 – Overall Roles and Responsibilities Relevant to the MWMP	10
Table 4.1 – Feedback Received on the Draft MWMP	12
Table 7.1 – Site Checks Relevant to the MWMP	24

1. Introduction

1.1 Summary

- 1.1.1 National Grid Electricity Transmission plc (here on referred to as National Grid) has produced an application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex ('the project'). This will be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km. The project meets the threshold as a Nationally Significant Infrastructure Project, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.1.2 This Materials and Waste Management Plan (MWMP) sets out project-specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill. The MWMP is based on the project details as submitted with the application for development consent. The MWMP also takes into account feedback received on a consultation draft version issued to relevant organisations in autumn 2022 (see Chapter 4 for details).

1.2 Project Overview

- 1.2.1 The reinforcement will comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.2 Four cable sealing end (CSE) compounds will be required to facilitate the transition between the overhead and underground cable technology. The CSE will be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.
- 1.2.3 Approximately 27km of existing overhead line and associated pylons will be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP substation would include associated works, including replacement pylons, a single circuit sealing end compound and underground cables to tie the substation into the existing 400kV and 132kV networks.
- 1.2.4 Some aspects of the project, such as the underground sections and the GSP substation, constitute 'associated development' under the Planning Act 2008.
- 1.2.5 Other ancillary activities will be required to facilitate construction and operation of the project, including (but not limited to):
- Modifications to, and realignment of sections of existing overhead lines, including pylons;
 - Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;

- Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
 - Diversion of third-party assets and land drainage from the construction and operational footprint; and
 - Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid's commitments to Biodiversity Net Gain.
- 1.2.6 The development authorised by the DCO must be undertaken in accordance with this MWMP, pursuant to Requirement 4 of the draft DCO (**application document 3.1**).
- 1.2.7 The MWMP describes the works undertaken pursuant to the DCO whether this is undertaken by National Grid, UK Power Networks (UKPN) and any appointed contractors appointed by these organisations. This document refers to 'the contractor' when referring to any organisation responsible for constructing components of the project (including removal of the 132kV overhead line).
- 1.2.8 National Grid, UKPN and any appointed contractors will carry out all work in accordance with the MWMP during the construction of the project unless otherwise agreed with the relevant planning authority.

1.3 Relevant Policy and Guidance

- 1.3.1 In accordance with their published approaches to sustainable design and construction, National Grid will seek to maximise resource efficiency, reducing the amount of waste generated, reducing water consumption and making the most efficient use of energy.
- 1.3.2 As part of its Environment Policy, National Grid seeks ways to use resources more efficiently through good design, use of sustainable materials, responsibly refurbishing existing assets, and reducing and recycling waste. National Grid's policy has been prepared in accordance with the waste hierarchy.
- 1.3.3 General measures that will be employed by National Grid and its contractor to limit effects on the environment include:
- The consumption of raw materials and waste shall be reduced through sound design and good practice in procurement; and
 - Opportunities for reusing or recycling the waste will be actively sought with disposal via landfill used as a last resort.
- 1.3.4 The following policy and guidance have been considered when drafting the MWMP:
- Achieving Good Practice Waste Minimisation and Management: Guidance for construction clients, design teams and contractors (Waste and Resource Action Programme, 2008).
 - Circular Economy Package Policy Statement (Department for Environment, Food and Rural Affairs (Defra), 2022);
 - Definition of Waste Development Industry Code of Practice (CoP) version 2 (Contaminated Land: Applications in Real Environment (CL:AIRE), 2011), referred to in this document as the CL:AIRE CoP;
 - Government Review of Waste Policy (Defra, 2011);

- National Planning Policy for Waste (Ministry of Housing, Communities and Local Government (MHCLG), 2014); and
- Waste Management Plan for England (Defra, 2021).

1.4 Purpose of the MWMP

- 1.4.1 The purpose of the MWMP is to set out how the project will seek to reduce the consumption of primary and raw materials and to encourage the use of secondary or recycled sources. It also sets out how the project will follow the waste hierarchy by reducing waste produced in the first place before considering alternatives such as reuse, recycling and repurposing. The contractor will be responsible for implementing the measures outlined within the MWMP and associated management plans.
- 1.4.2 The project as submitted with the application for development consent includes environmental commitments under the following categories:
- Embedded measures: measures that form part of the engineering design as set out in Construction Environmental Management Plan (CEMP) Appendix B: Register of Environmental Actions and Commitments (REAC) (**application document 7.5.2**);
 - Good practice measures: standard approaches and actions to be implemented on construction sites, intended to protect the environment. These may be general or topic-specific and are typically applicable across the whole project. The good practice measures are provided in full in CEMP Appendix A: Code of Construction Practice (CoCP) (**application document 7.5.1**); and
 - Additional mitigation measures: any additional project-specific measures needed to avoid, reduce or offset potential impacts that could otherwise result in effects considered significant in the context of the Environmental Impact Assessment (EIA) Regulations 2017. Additional mitigation measures have been identified by environmental specialists as part of the Environmental Statement (ES), taking into account the embedded and good practice measures. The additional mitigation measures can be found in CEMP Appendix B: REAC (**application document 7.5.2**).
- 1.4.3 The CEMP (**application document 7.5**) and its appendices provide a securing mechanism for all environmental commitments made on the project (refer to paragraph 1.4.2 above). Construction phase measures relevant to materials and waste are also secured within this MWMP.
- 1.4.4 Construction phase measures for all other environmental topics are secured by one of the following three documents:
- CEMP (**application document 7.5**): general construction measures and methodologies to avoid or reduce potential effects of the project;
 - Construction Traffic Management Plan (**application document 7.6**): measures to manage construction traffic and impacts on the traffic network; and
 - Landscape and Ecological Management Plan (**application document 7.8**): measures to manage construction impacts on landscape and ecology.

1.5 Structure of the MWMP

- 1.5.1 The MWMP structure is set out in Table 1.1.

Table 1.1 – Structure of the MWMP

Chapter	Content
1. Introduction	This sets out the purpose of the MWMP and how it is structured.
2. Project Description	This describes the project commitments made including the good practice measures in the CoCP (application document 7.5.1). It also describes the activities that have been undertaken in terms of designing out waste. It also sets out the targets for the project in relation to materials and waste.
3. Project Team Roles and Responsibilities	This sets out the roles and responsibilities relevant to the MWMP including the site checks and reporting that is proposed.
4. Engagement on the MWMP	The MWMP was issued as a draft version to relevant organisations for comment. This section summarises the comments received and how these have been considered when developing the MWMP submitted with the application.
5. Material Management	This sets out how the project will manage materials on the project. It sets out the measures to reduce consumption of raw materials and encourage use of secondary sources. It also highlights measures to manage water and energy efficiently during construction.
6. Waste Management	This sets out how the project will manage waste on the project. It sets out the measures to employ the waste hierarchy and other commitments that relate to contaminated land risks. It also sets out the documentation that will be used to track and record waste on the project.
7. Implementation	This sets out the site checks that will be undertaken to monitor compliance of the MWMP during construction. It also sets out the complaints procedure.

2. Project Description

2.1 Project Commitments

- 2.1.1 The project is the result of a process of iterative design development that was introduced at project inception. Environmental considerations have had a key influence on the project, with knowledge gained through the EIA process, input from the project team (including the results of site surveys) and discussions with interested parties (such as landowners, relevant planning authorities and regulators).
- 2.1.2 As explained in Chapter 1, the project incorporates environmental considerations through measures embedded in the design, good practice (general measures and topic-specific) measures and additional mitigation measures identified in the ES. For ease of reference these have been assigned a reference number:
- Embedded measures are given a prefix of EM then the relevant geographical section (e.g. AB: Bramford Substation / Hintlesham), followed by a unique number (e.g. EM-AB01 is the first embedded measure identified in Section AB: Bramford Substation/Hintlesham);
 - Good practice measures are given a unique reference number based on the aspect. For example, general good practice measures are identified with a GG prefix, whereas the topic specific ones are given a prefix based on the topic initials (e.g. landscape and visual measures are referenced as LV01, LV02 etc); and
 - Additional mitigation measures are given a prefix of EIA, followed by the topic initials and a unique reference number, for example EIA_B01 would be a measure identified in the biodiversity assessment to offset a significant effect.
- 2.1.3 These references are used throughout this MWMP.

2.2 Designing Out Waste

- 2.2.1 The project has sought to design out waste at each step in the option and design process. This has included designing the project to avoid unnecessary elements and to seek compatibility between market supply and specification. This has included avoiding design complexity and seeking to standardise the construction process to reduce the quantity of materials. This also increases the ability to reuse materials and equipment between different projects.
- 2.2.2 Table 2.1 includes measures that have been identified on the project that are relevant to use of the waste hierarchy and designing out waste.
- 2.2.3 National Grid will continue to seek ways to design out waste through the detailed design and construction phase of the project.

Table 2.1 – Examples As to How Waste Has Been Designed Out on the Project

Activity	Method	Resource Saving
Removal of pylon foundations	Using a crushing machine to break up the excavated material so that it can be used as suitable backfill.	Reduces the need for backfill material to be imported.

Activity	Method	Resource Saving
Temporary access roads materials	Trackway has been assumed for removal of the 132kV overhead line and some locations where new overhead line would be constructed. Trackway can also be reused between projects.	Reuses trackway which is higher up the waste hierarchy than alternatives such as stone roads. Reduces the need for imported stone and for that stone to be taken off site and recycled.
Temporary access route materials	Temporary access routes have been designed for the width that is anticipated for the machinery using the routes and to allow passing places.	Reduces land take associated with two-way routes.
Vegetation removal	Reusing vegetation arisings on site in the form of log piles and wood chippings in landscaping where this complies with ecological objectives.	Reduces the amount of waste sent off site and also has an ecological benefit on site.
Soil reuse	Commitment to soil handling techniques set out within the CEMP (application document 7.5) to allow the effective reuse and classification of soils as non-waste.	Reduces soil sent offsite and reduces or eliminates soil imported.
Pylons designed and pre-fabricated offsite	Prefabrication of parts of pylons in an offsite facility specifically designed to limit waste and raw materials. These can also be brought to site in fewer vehicles than non-refabricated designs.	Reduces offcuts and waste created on site compared to non-prefabricated designs. Metals can be easily sent for recycling at the factory due to existing supply chains. Reduces vehicle numbers coming to and from site during construction than non-prefabricated design.
Using CAD modelling to estimate material quantities	Accurate calculation of material requirement for procurement.	Reduces overproducing materials, reduces waste and vehicle numbers coming to and from site.
Procurement seeking use of local suppliers and providers.	Using local suppliers and producers to provide materials and services.	Reduces haulage miles and emissions.

2.3 Consents, Licences and Permits

- 2.3.1 The project will be run in compliance with all relevant legislation, consents and permits in accordance with good practice measure GG01. Where required, permits from relevant planning authorities and/or the Environment Agency, will be sought prior to commencement of the relevant works. Consultation will be undertaken by the contractor with the appropriate bodies.

2.4 CL:AIRE

- 2.4.1 The CL:AIRE CoP (2011) was developed to help facilitate the use of excavated materials as non-waste. The CoP sets out a mechanism for working outside the waste legislation framework regarding the use of excavated materials, applicable to both greenfield and brownfield sites. In order to comply with the CL:AIRE Protocol, the excavated materials assessed as part of the project, must:

- Not be a risk to human health;
- Be suitable for their intended use without further processing (chemically and geotechnically); or
- Be suitable for use following treatment under an appropriate Environmental Permit;
- Have a certainty of use (specified in planning, remediation strategies); and
- Be only the quantity that is absolutely necessary.

2.4.2 Chapter 11: Agriculture and Soil in the CEMP (**application document 7.5**) contains good practice guidance for the excavation, handling, storage and final placement of soils. These measures will help protect soils during construction and allow the application of the correct processes for storage and reuse to maintain their classification as non-waste material in the Definition of Waste (CL:AIRE, 2011).

Evidence and Reporting

2.4.3 In order to comply with the requirements of the CL:AIRE CoP, demonstrating protection of human health and the environment, the suitability and certainty of use together with quantity of materials, the following additional information are expected to be produced:

- A Design Statement on how the use of materials will be undertaken on site, relating to the design objectives for the site;
- Desk study, site investigation and/or laboratory test information demonstrating the suitability of use of the proposed materials;
- Details of the contractual arrangements; and
- The verification process, including provision of tracking systems, contingency arrangements, verification testing and reporting.

Resource Requirements

2.4.4 The material resources to be used, including types and quantities, will be based on the requirements of the project, together with site investigation results indicating the ground conditions and materials to be excavated. In addition, soil surveys have been undertaken to help understand the baseline soil characteristics and to inform the storage and reinstatement of soils (see ES Appendix 11.1: Agricultural Land Classification Survey (**application document 6.3.11.1**)).

2.4.5 The phasing of materials use, management and any measures relating to their use will be outlined and implemented. The reduction of material resources will be achieved through a number of measures such as attention to specifications, timescales for delivery, storage and handling requirements. The method of transporting material resources to reduce road transport will form an important element to this process.

2.4.6 The main works contractor will assess the main materials to be used on the project. This assessment will be subject to a CL:AIRE Declaration by the Qualified Person (QP). The materials will be assessed to fall within one of the following categories:

- Material is capable of being used in another place on the same site without treatment;
- Material is capable of being used in another place on the same site following on-site ex-situ treatment;
- Material is capable of being used on another development site without treatment;

- Material is capable of being used on another development following ex-situ treatment on another site (designated as a hub site);
- Material is not capable of being used on site or elsewhere and as such will require recovery or disposal offsite as waste; and
- Material is surplus to requirements and as such will require recovery or disposal offsite as waste.

Movement and Tracking Systems

2.4.7 The movement of materials associated with the project will be tracked and evidence generated to provide an auditable trail. The tracking system is anticipated to include:

- Annotated plans of the site identifying excavation areas, stockpile locations, any treatment areas and placement locations;
- Inspection and testing procedures to verify materials are as anticipated from the site investigation information;
- Tracking forms and control sheets to record the movement of materials, including delivery tickets if materials are moving between sites; and
- Acceptance and testing procedures if materials are moving between sites.

Site Records

2.4.8 The following records will be kept:

- Copies of any relevant licences and permits;
- Details of any planning or consent approvals;
- Material resources tracking, treatment and delivery note records; and
- Records of any contingency arrangement for materials resources and unforeseen waste arisings that had to be implemented.

Verification Plan and Verification Report (CL:AIRE)

2.4.9 The Verification Plan will identify how the placement of materials will be recorded and the quantity of materials to be used. The Verification Report is produced to provide an audit trail to show that materials and waste have gone to the correct destination(s).

2.4.10 The Verification Report will also document any changes arising from any alterations to the project or contingency arrangements that had been implemented.

Qualified Person Assessment

2.4.11 The assessment will be subject to review and declaration by a QP, who will be registered with CL:AIRE. The assessment will be submitted to the Environment Agency for information and as a record. The declaration serves as notification that having reviewed the evidence relating to the proposed use of materials on site, the QP is satisfied that the CL:AIRE CoP can be applied appropriately.

2.4.12 Subject to acceptance and sign-off of the assessment by the QP, it is assumed that there will be no requirement for the Environment Agency to have any input to the process other than for auditing purposes. This could involve visiting the site and reviewing the assessment documentation, operation and management at the site and at any site(s) receiving the material.

2.5 Targets for Material Management and Waste Reduction

2.5.1 National Grid has set out its environmental commitments in 'Our 2021-2026 Environmental Action Plan' (National Grid, 2021). This has a number of targets that are relevant to the project and have been tailored to be project specific targets:

- Contribute towards carbon neutral construction: ES Appendix 4.3: Greenhouse Gas Assessment (**application document 6.3.4.3**) sets out the baseline carbon estimate for the project. This will be used as a baseline against which the construction carbon will be measured. This will include monitoring of energy use on the project and vehicle mileage. The contractor will report on progress against the carbon baseline on the project quarterly;
- The contractor appointed to construct the project will have carbon reduction targets;
- The project will seek to reduce waste to landfill during construction and contribute to the target to achieve zero-waste to landfill across construction projects; and
- The project will keep records of how it has followed the waste hierarchy to reduce waste and avoid waste being sent to landfill.

2.5.2 These targets will be monitored by the contractor during construction.

3. Project Team Roles and Responsibilities

3.1 Environmental Management Systems

- 3.1.1 National Grid will implement management processes and briefings so that the works are carried out in accordance with current legislation and guidance. This will be achieved by application of well-established work processes that apply the recognised British Standard EN ISO 14001:2015 or equivalent.
- 3.1.2 The contractor will have an Environmental Policy that meets the requirements of ISO 14001 or equivalent, through their internal Business Management System procedures. The policy statement will be displayed on the site notice boards, publicised to all site staff and operatives, and made available to interested parties upon request.

3.2 Project Responsibilities

- 3.2.1 The contractor will undertake the construction works in accordance with the DCO and its associated documents including this MWMP. The relevant aspects of this MWMP will be notified to the workforce at commencement of works to highlight the relevant commitments and responsibilities to those undertaking the work.
- 3.2.2 Overall roles and responsibilities for the project are presented in Table 3.1. These roles may be delivered by multiple people across the project, who are designated with that specific responsibility, such as the Environmental Clerk of Works (EnvCoW). The EnvCoW will also draw on the experience of the technical specialists, who will advise in specific areas, for example a soil scientist who can advise on reusing soil within the Order Limits.

Table 3.1 – Overall Roles and Responsibilities Relevant to the MWMP

Role	Organisation	Responsibilities
Environmental Manager	Contractor	The Environmental Manager will be responsible for the maintenance of all environmental plans and registers, including monitoring that the environmental measures and mitigations are implemented on site and as recorded within the MWMP. They will be the main point of contact for all environmental matters on the project. They will oversee ecological pre-construction surveys. They will also develop good working relationships with external stakeholders such as the Environment Agency and the relevant planning authorities.
Site Waste Manager	Contractor	The Site Waste Manager will be responsible for day-to-day waste management and maintaining site waste registers/ documentation. They will maintain the central register of all waste consignment notes together with schedules of carriers and disposal locations and waste datasheets to provide efficient tracking of waste management as part of record keeping for internal and external auditing purposes.
Environmental Clerk of Works	National Grid	The EnvCoW will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required mitigation measures. The EnvCoW will be supported by appropriate technical specialist advisors depending on the location and potential impacts.

Role	Organisation	Responsibilities
Permits and Consents Manager	Contractor	The Permits and Consents Manager will work with the Environmental Manager to draft and submit permits and consents on behalf of the project, track the progress, provide updates and communicate approvals.
Works Supervisor	Contractor	The Works Supervisor will be responsible for delivering the site works in accordance with the requirements of the MWMP and implementing good environmental practices required by the Environmental Manager. They will be responsible for managing operatives, plant and their areas of work in accordance with the principles of good environmental practice.
Technical specialist advisors	Contractor / National Grid	These will have the relevant experience to supervise the relevant aspects of the works, which may include a land contamination specialist and a soil specialist as required depending on the nature of works.

3.3 Duty of Care

- 3.3.1 All waste produced by National Grid and their contractor is governed by waste management legislation. The producer of the waste is the holder of the waste generated by an activity. Duty of Care is a legal process designed to control the carriage and disposal of waste to ensure it is handled in a responsible manner from 'cradle to grave'.
- 3.3.2 In line with the Duty of Care requirements, waste produced will be transferred only to an Authorised Person accompanied by a Waste Transfer Note or Hazardous Waste/Special Waste Consignment Note (see Section 6.6) and not able to escape from anyone's control on site or in transit. An Authorised Person is a Registered Waste Carrier and/or the manager of a legitimate waste management facility, e.g. a waste disposal site. Waste shall not be allowed to leave site unless Duty of Care checks are successfully completed.
- 3.3.3 Where a contractor is employed to undertake work that produces waste, it is the contractor's responsibility as producer of the waste to carry out the Duty of Care checks. However, National Grid, as the overall developer, retains a Duty to ensure that waste is managed in a responsible manner and will ensure that the contractor has a system of works to ensure that adequate Duty of Care checks are being undertaken.

3.4 Information Training and Awareness

- 3.4.1 In accordance with good practice measure GG05 in the CoCP (**application document 7.5.1**), all staff and operatives working on the project will undergo a site-specific induction, which will include the following environmental topics relevant to the MWMP:
- Waste management: legislation, segregation, contamination and best practice; and
 - Contaminated land: recognising and dealing with contaminated material.
- 3.4.2 Employees involved with the handling and managing of waste will have the relevant training and be assessed as competent and training records retained.
- 3.4.3 Regular environmental toolbox talks will be provided by the contractor for all staff. These will give targeted information about site-specific issues or activities taking place at that time.

4. Engagement on the MWMP

4.1 Introduction

- 4.1.1 This chapter sets out the engagement that has been undertaken on the MWMP and how the comments were considered when developing the final MWMP for application.

4.2 Engagement

- 4.2.1 The MWMP was issued to the following organisations to seek feedback on the contents and structure before producing the final MWMP for the application for development consent:

- Suffolk County Council;
- Essex County Council;
- Babergh and Mid Suffolk District Councils;
- Braintree District Council; and
- The Environment Agency.

4.3 Feedback on the MWMP

- 4.3.1 Table 4.1 summarises the feedback received on the draft MWMP and how these have been considered when developing the final MWMP for application. No specific comments were received from the Environment Agency, Babergh and Mid Suffolk District Councils and Braintree District Council on the MWMP.

Table 4.1 – Feedback Received on the Draft MWMP

Comment	How This Has Been Considered
Essex County Council	
The underlying commitments, mitigations and methodologies set out in the draft MWMP appear to be sufficiently comprehensive although it is noted that at this stage the MWMP is unquantified.	Noted.
Paragraph 6.4.2 notes that ‘ <i>The contractor will use the detailed design drawings to inform the procurement strategy so that the right quantities and type of material is ordered. These steps will reduce waste being created in the first place</i> ’ and therefore it is assumed that an assessment of required materials has not yet taken place. Similarly, it is assumed that a quantification of waste likely to be generated through the replacement of existing infrastructure has also not yet been undertaken.	ES Chapter 4: Project Description (application document 6.2.4) contains a summary of anticipated materials and waste assumed on the project. However, the final materials will be identified by the contractor following detailed design.

Comment	How This Has Been Considered
<p>Paragraph 6.3.4 states that <i>‘The project is unlikely to generate large quantities of waste for landfill due to the nature of the waste anticipated and also due the targets set by National Grid with regards to waste management. Essex County is forecasting to be at capacity over the plan period, however there is landfill capacity within Suffolk, within which the majority of the project lies. Therefore, based on the estimated levels of waste estimated to be produced by the project will not exceed the waste capacity available in the region.’</i> Whilst there is no explicit reason to doubt this conclusion, no quantified assessment is provided within the MWMP.</p>	<p>ES Chapter 4: Project Description (application document 6.2.4) contains a summary of anticipated quantities of waste on the project. However, the final quantities of waste will be identified by the contractor following detailed design.</p>
<p>It is considered that the final MWMP should consider being more explicit with regards to the targets informing Section 2.5. Whilst the general approach is supported and the commitments sound, it is questioned how project specific these targets currently are given the current absence of quantification.</p>	<p>National Grid will define more specific targets during the detailed design stage of the project when a contractor has been appointed.</p>
<p>It may also be appropriate for the MWMP to consider the phasing of the overall project in terms of the types of waste that may be generated and managed at different stages of development, and how this relates to on-site storage and management.</p>	<p>A note has been added in Section 6.4 to this effect.</p>
Suffolk County Council	
<p>The aims and aspirations of the MWMP are laudable and although unquantified, the quantities of waste that are likely to arise seem unlikely to overwhelm the local waste facilities in Suffolk.</p>	<p>Noted.</p>
<p>SCC would expect the applicant to identify design of permanent highway works based on the selection of that to minimise the whole life cost or impact of any treatment.</p>	<p>The relevant highway authority will be consulted on the design of any permanent works to the highway.</p>
<p>The applicant should note that due to the age of many local roads there is a risk that bituminous materials may contain coal tar. Appropriate screening of core samples to detect the presence of coal tar is strongly recommended where excavation of the carriageway is required.</p>	<p>Noted. Text has been added to the list of materials in Section 6.5.</p>

5. Material Management

5.1 Introduction

- 5.1.1 This chapter sets out the measures that will be undertaken in relation to material management. National Grid and its contractor will adopt the control measures when undertaking the construction of the project. The chapter is very closely linked with Chapter 6: Waste Management, as some waste materials can be considered as a material source.
- 5.1.2 Every project requires materials as part of the construction process. These can come from primary, or virgin sources, or from secondary sources. The types of materials used and the sources of these can have environmental implications. Materials also have embodied carbon, which can affect the overall carbon footprint of the project.
- 5.1.3 When considering materials to use on a project, the first consideration is to identify whether materials can be sourced from another project, for example the reuse of site cabins or security fencing. In some cases, secondary aggregates can be used to avoid sourcing virgin materials from quarries. If purchasing new is the only option, there are potentially more sustainable sources that should be followed, e.g. purchasing Forest Stewardship Council (FSC) certified timber. Projects can also reduce their environmental footprint through the efficient use of energy and water.
- 5.1.4 This chapter sets out the principles for material management that will be followed by National Grid and its contractor when implementing the project.

5.2 Efficient Material Use During Construction

- 5.2.1 The following steps will be taken through the detailed design and construction phases of the project with relevance to material management:
- Wherever practicable, the designs will seek standardisation of materials and building elements into the design e.g. the use of prefabricated components. This will provide greater compatibility between market supply and specification. This in turn, will reduce the risk of over-specification which reduces the choice of available material sources and will increase the opportunities to reuse materials and equipment between different projects;
 - Wherever practicable, materials will be ordered to size and actual requirements in order to reduce over-ordering and potential wastage. This will include working with manufacturers to reduce the amount of packaging used during the transportation of materials and supporting suppliers who will take back packaging and returns of unused products;
 - Sourcing construction materials from suppliers with responsible sourcing certification and using local suppliers where practicable. The use of local suppliers will also reduce transport miles, reducing the carbon footprint of the project;
 - Using 'just in time' deliveries where practicable, so that storage is optimised and to reduce the risk of oversupply and damage on site; and
 - Managing resource efficiency by storing materials in the correct way to avoid risks of damage, spillage and vandalism. Particular attention should be given around the delivery of materials to site and making sure these are unloaded in a way that reduces the risk of damage in accordance with good practice measure GG13 in the CoCP.

- 5.2.2 Timber will be obtained from recycled, reclaimed sources or be accredited to meet sustainable forestry standard such as the FSC. Any remaining timber not sourced through the above will target a known temperate source using the Defra central point of expertise in timber.
- 5.2.3 The main site compound is located off the A134 near Leavenheath. This will contain designated areas for the secure storage to protect materials from damage or wastage and away from regular site traffic to reduce the risk of accidental collision. The original package/pallets will be used to keep materials secure until required and material covers will be used where required, to protect materials sensitive to rainwater. The materials storage area will be secured out of hours to prevent unauthorised access.
- 5.2.4 The working width will also contain designated areas for the storage of soil and space to allow topsoil and subsoil to be stored separately.

5.3 Efficient Water Consumption During Construction

- 5.3.1 The main uses of water on the project will be:
- General water consumption: This includes drinking water for workers, handwashing and washing facilities and flushing of toilets. Water consumption will be reduced by having variable flush toilets, cut-off taps and efficient washing machines where provided;
 - Trenchless crossings: Non-potable water will be used as a preference for the trenchless crossings. It is assumed that this would be brought to site in tankers;
 - Dust suppression: Non-potable water will be used as a preference to suppress dust generated during the work, particularly during dry spells; and
 - Cleaning of roads and working areas: Non-potable tanker water will be used to clean roads and working areas. Similarly for dust suppression reuse of water will be sought.
- 5.3.2 The main site compound may be connected to mains water supply and use suitable treatment measures such as biodigesters for wastewater or for this to be taken away by tankers. The satellite compounds are likely to have water deliveries to supply potable water to welfare facilities and foul water will be treated using suitable technology, for example, biodigesters, and/or taken away by tankers as waste.
- 5.3.3 Construction compounds will be provided with good practice measures for water conservation, for example the use of water-efficient taps within welfare facilities, waterless toilet facilities, assessment of whether water can be reused, and regular checks to hoses for water leaks. Further details on water use and consumption can be found in Chapter 9: Water Environment of the CEMP (**application document 7.5**).

5.4 Efficient Energy Use During Construction

- 5.4.1 In accordance with good practice measure GG12 in the CoCP (**application document 7.5.1**), vehicles will be correctly maintained and operated in accordance with manufacturer's recommendations and in a responsible manner. All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so.
- 5.4.2 As noted in ES Appendix 4.3: Greenhouse Gas Assessment (**application document 6.3.4.3**), National Grid will request the tendering contractors to propose low carbon alternative materials as part of their response to the main works package, where suitable (e.g. meets the technical specifications and is not disproportionate in cost). The tendering contractors will also complete National Grid's Carbon Interface Tool (CIT), where they

provide a more detailed breakdown of materials, assets, equipment and energy that they propose to use in construction of the project. The CIT considers the origin of materials, the transport distances, opportunities for reuse of materials and low carbon alternatives. The CIT of all bidders are compared at tender to inform the evaluation and scoring of the tender.

- 5.4.3 On tender award this CIT will become the 'carbon baseline' for the project and the contractor is incentivised to demonstrate a reduction in capital carbon over the duration of construction of the project. The CIT and carbon footprint will be reviewed on a regular basis and there will be key performance indicators in place that incentivise the contractor to reduce the carbon footprint against the initial baseline.
- 5.4.4 Temporary site units will be energy efficient, for example having the following features, where practicable:
- Double glazed windows;
 - Insulated walls;
 - Energy efficient lighting, with motion sensors; and
 - Energy monitoring and smart switching.
- 5.4.5 It is anticipated that the main site compound will be connected to a mains electricity supply. The contractor would seek to source electricity from green energy suppliers. Local compounds and isolated work fronts will use hybrid generators with battery units where appropriate. Generators will be appropriately sized to optimise running efficiency.
- 5.4.6 Non-hybrid fleet vehicles are presently being phased out and consideration will be given to electrical vehicles where available. Charging points will be provided for site vehicles at the main site compound.

6. Waste Management

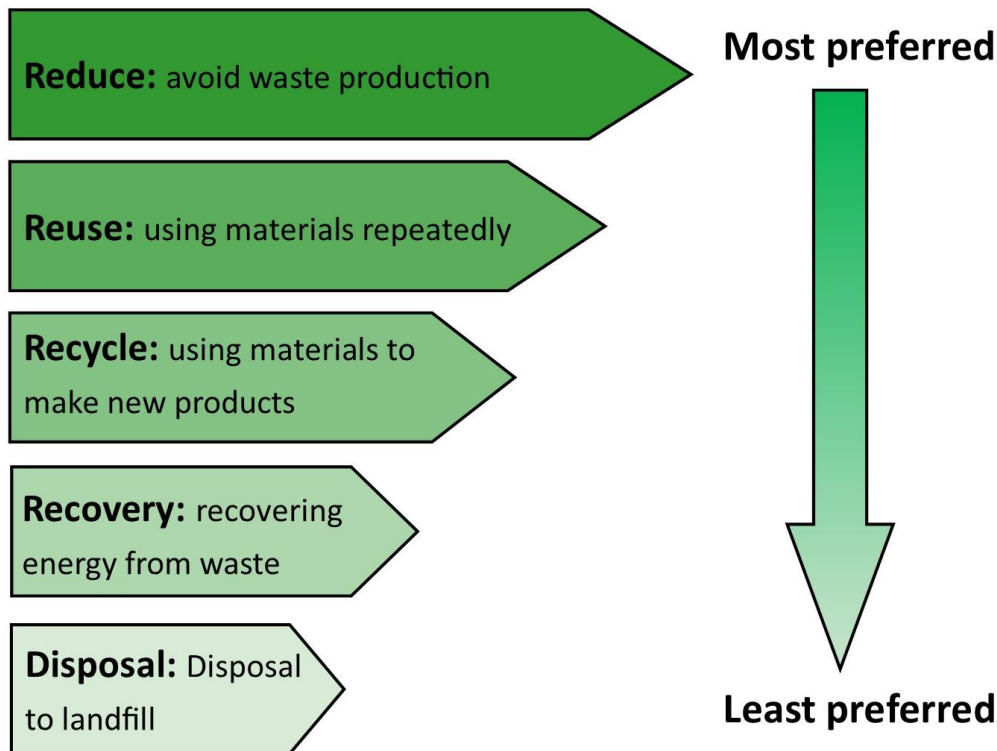
6.1 Introduction and Definitions

- 6.1.1 This chapter sets out the measures that will be undertaken in relation to waste management. National Grid and its contractors will adopt the control measures when undertaking the construction of the project. This chapter should be read alongside the CEMP (**application document 7.5**).
- 6.1.2 Waste is defined in Article 1 (1) (a) of the Waste Framework Directive (2008/98/EC) as *‘any substance or object which the holder discards or intends or is required to discard’*.
- 6.1.3 ‘Holder’ means *‘the producer of the waste or the natural or legal person who is in possession of it’*. It rests, in the first place, with the producer or holder of a substance or object to decide whether it is being discarded and is waste.
- 6.1.4 Waste is widely defined and includes excess unwanted materials, effluents, unwanted surplus substances arising from the application of any process and any substance or article which is broken, worn out, contaminated or otherwise damaged. Waste becomes controlled by legislation when it is discarded by the holder. Materials being returned to the company stores or supplier for credit are not considered as waste. Materials sold for re-use or re-cycling are still classified as waste and subject to all the statutory controls, including Duty of Care.
- 6.1.5 Waste ceases to be waste once it has achieved ‘Final Recovery’. This is when the waste material (in the view of the Regulator) has been incorporated into a final product.
- 6.1.6 Waste falls into two main classifications as defined by the Landfill Directive and European Council Decision (2003/33/EC) for the purposes of management and disposal.
- Hazardous waste: This means any waste which is covered by Article 1(4) of Council Directive 91/689/EEC of 12 December 1991 on hazardous waste; and
 - Non-hazardous waste: This means waste which is not covered by hazardous waste.
- 6.1.7 Non-hazardous waste is further defined as:
- Municipal waste: This means waste from households, as well as other waste which, because of its nature or composition, is similar to waste from household; and
 - Inert waste: This means waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater.

6.2 The Waste Hierarchy

- 6.2.1 The waste hierarchy (Illustration 6.1) is designed as a process, which starts with measures to avoid the production of waste in the first place, through reuse, recycling and recovery, so that the least amount of waste is sent for disposal. The project will follow this hierarchy.

Illustration 6.1 – The Waste Hierarchy



6.3 Regional Waste Management Facilities

- 6.3.1 A review of local waste disposal sites has been completed in line with the requirements of National Policy Statement EN-1.
- 6.3.2 Suffolk County Council's Minerals and Waste Local Plan (2020) draws on the Suffolk Waste Study 2018. This indicates that there is no identified shortfall in waste management facilities, and there is sufficient landfill capacity within Suffolk to last until the end of the Plan period in 2036.
- 6.3.3 The Essex and Southend-on-Sea Waste Local Plan (2017) identifies that there is a need for an additional (recycling or disposal) capacity, partly due to the expiry of existing temporary planning permissions, to meet the forecasted increase in waste management needs for waste streams up to 2032. The current capacity of inert landfill across the County is 5.1Mt. This is not sufficient to accommodate both the needs of the Plan area and the inert waste projected to be imported from London. Even after the allocation of all sites suitable for inert waste recycling and inert waste landfill, there is a further need to find management solutions for a total of 7.05Mt of inert waste.
- 6.3.4 The project will not generate large quantities of waste for landfill due to the nature of the waste anticipated (large proportions of which can be reused or recycled) and also due to the targets set by National Grid with regards to waste management. Essex County is forecasting to be at capacity over the plan period, however there is landfill capacity within Suffolk, within which the majority of the project lies. Therefore, the levels of waste estimated to be produced by the project will not exceed the waste capacity available in the region.

6.4 Waste Management During Design and Construction

- 6.4.1 The following steps will be taken through the detailed design and construction phases of the project with relevance to waste management.

Design and Pre-construction

- 6.4.2 As outlined in Section 2.2, waste will be considered during the detailed design stage of the project as part of seeking further opportunities to design out waste at source. During pre-construction, the contractor will manage resources in an effective manner to reduce the risk of over-ordering materials or purchasing the wrong type of material, both of which can lead to the production of waste. The contractor will use the detailed design drawings to inform the procurement strategy so that the right quantities and type of material is ordered. These steps will reduce waste being created in the first place.

Site Planning and Preparation

- 6.4.3 The main site compound is located off the A134 at Leavenheath. This will contain designated waste storage areas. In accordance with good practice measure GG10 in the CoCP (**application document 7.5.1**), the layout of the main site compound will be planned to locate activities (such as material and waste storage) or equipment that may produce a noticeable nuisance from dust away from sensitive receptors such as residential properties or ecological sites where practicable.
- 6.4.4 When planning the layout of the main site compound, the contractor will consider the phasing of the overall project in terms of the types of waste that may be generated and managed at different stages of development, and how this relates to on-site storage and management.
- 6.4.5 Materials will be reused where practicable, for example temporary site cabins and fencing can be reused on different construction projects. This can also apply to temporary site matting (such as trackway) used in temporary access routes and plastic/ concrete pipes used in temporary culverts crossings. Materials will be suitably stored to avoid damage.
- 6.4.6 In accordance with good practice measure GG11, waste will be separately stored to avoid cross contamination. The type of waste will dictate the containers and laydown areas required to facilitate safe storage including measures to avoid the risk of pest and vermin. Storage containers will be labelled to indicate the type of waste or materials that may be deposited in them. Contaminated or hazardous waste will have separate designated areas within the main site compound to avoid the risk of contaminating other material and waste streams. Handling and storage of these will be dependent on the level, type or classification of the waste.
- 6.4.7 The contractor will implement the good practice measures set out in Chapter 11: Agriculture and Soil of the CEMP (**application document 7.5**). This will protect the soil quality and structure of soils temporarily disturbed during construction and allow them to be reused during the reinstatement process. Excess soil gained from the displaced soil within the cable trenches will be reused in backfilling the holes created from the foundation removal of the dismantled 132kV and 400kV pylons or in local landscaping mounding around the CSE compounds or spread across the cable sections. National Grid is intended that all soil will be reused on site, however if it arises that excess spoil cannot be reused on site and is required to be taken off site, the process (including certification and licensing) will be recorded as necessary. Where soil is potentially contaminated, it will follow the measures outlined in Section 6.5.

Reinstatement

- 6.4.8 In accordance with good practice measure GG07 in the CoCP (**application document 7.5.1**), land used temporarily will be reinstated where practicable to its pre-construction condition and use. Any topsoil or subsoil removed to facilitate construction will be reused

and replaced in accordance with the good practice measures in Chapter 11: Agriculture and Soil of the CEMP (**application document 7.5**).

6.5 Handling and Disposal of Waste During Construction

Typical Construction Waste

6.5.1 During construction, various waste will be created during the works. This is likely to include the following sources (which will be stored separately to avoid cross contamination) along with the likely waste management methods:

- **Vegetation arisings:** Green waste will be created from the clearance of trees and vegetation within the working area. Some of these arisings may be retained on site where the landowner agrees and this is identified as having a clear ecological benefit. In such cases, vegetation may be left to form dead wood habitat, log piles or chippings and mulch. Any vegetation that cannot be used on site, and therefore highlighted as requiring removal, will be composted as green waste at a recycle facility where suitable i.e. not containing INNS;
- **Cable drums:** It is anticipated that these would be returned to the cable drum manufacturer for reuse on other projects;
- **Mixed metal such as aluminium and steel:** Steel and aluminium are recyclable with a high degree of efficiency and will include the conductors and pylons removed as part of the dismantling of the redundant parts of the 132kV and 400kV overhead lines. It would also include metal offcuts, such as those from cables, pylons and piling. Metal will be collected and recycled off-site at a recycling facility for disposal;
- **Highways material including asphalt and bitumen:** Spoil excavated during the cable trenches within highways or private roads will be segregated and tested where required. It will then be disposed of at a specialised recycling facility as required. Suffolk County Council has noted that due to the age of many local roads there is a risk that bituminous materials may contain coal tar and appropriate screening of core samples to detect the presence of coal tar is strongly recommended where excavation of the carriageway is required;
- **Cement and concrete:** This is likely to include concrete used in the foundations of the redundant parts of the 132kV and 400kV overhead lines. It is anticipated that cement or concrete arisings will be collected and recycled as hardcore at a recycling facility. Cement washings will be collected into a designated area and disposed of off-site;
- **Wooden formwork/temporary works:** All wooden formwork/ temporary works or support timbers such as those used within the drilling pits or foundations, where clean, will be collected and reused and sent to a recycling facility or disposed of. If the timber has come into contact with poured concrete, it shall be disposed of as hazardous waste;
- **Crushed stone:** It is anticipated that virgin crushed stone will be used during the temporary works and will include the surface of the main construction compound, crane pads and some of the temporary access routes. When the temporary works are complete, the crushed stone will be carefully removed to avoid disturbance of the underlying soil. Where suitable, the stone will be reused on other construction projects or sent to a recycling facility for disposal;
- **Drilling mud:** If horizontal directional drilling is used for the trenchless crossings, drilling mud (for example bentonite) may be used as part of the drilling process. This

will be collected and reused where practicable, or sent to a recycling facility for treatment for onward use, for example as secondary aggregate in the construction industry;

- Greases, fuels and oils: All greases and oils will be collected and sent to a recycling facility for treatment and disposal as hazardous waste;
- Wastewater: Wastewater including potable and site toilet waste generated from the construction compound welfare facilities will be discharged to sewer, subject to the agreements with the utility providers. In locations where a sewer connection is not reasonably practicable, wastewater will be collected and tankered off site for disposal at a licensed treatment facility;
- Construction and post-construction drainage materials: Plastic, concrete, brick and stone-based materials will be used as part of the construction and post-construction drainage installation. Waste generated from these will be collected and sent to a recycling facility for treatment and disposal; and
- Flume pipes: The project will be using a number of flume pipes as part of the temporary works at watercourse crossings. These can be made of various materials depending on the size and purpose. Flume pipes will be reused/recycled where practicable through the length of the project and either treated and reused, or sent to a recycling facility for disposal, when no longer required.

6.5.2 Other waste may be generated during construction and would be subject to the waste hierarchy of reusing or recycling where practicable, in accordance with the project's waste minimisation targets.

General Office Waste

6.5.3 In addition to the general construction waste, there will be offices and welfare cabins at the main site compound and the smaller satellite compounds. The following items will be separated in dedicated bins so that they can be recycled at an appropriate waste facility:

- Paper and cardboard;
- Metal such as aluminium cans;
- Plastic;
- Glass (not including bulbs and fluorescent tubes);
- Ink cartridges and toner cartridges; and
- Batteries.

6.5.4 The project will also generate general office waste, which includes items that are not classified as hazardous but that cannot be reused or recycled. These will be disposed of in general waste bins and sent an appropriate facility for disposal. General office waste includes biodegradable kitchen and canteen waste.

Unexpected Contaminated Soils

6.5.5 ES Chapter 10: Geology and Hydrogeology (**application document 6.2.10**) identified that during construction there is the potential for unexpected contamination to be encountered.

6.5.6 Chapter 10: Geology and Hydrogeology of the CEMP (**application document 7.5**) sets out how unexpected contamination is identified and the process for developing working methods for managing any risks. If, following the assessment set out in Chapter 10:

Geology and Hydrogeology of the CEMP (**application document 7.5**), material is assessed as being unsuitable for use due to contamination, this material would need to be removed from the site as a waste. The material would undergo waste classification prior to removal following the technical guidance outlined in WM3 (Environment Agency, 2021).

Other Controlled and Contaminated Waste

6.5.7 The following waste products are controlled or classed as hazardous waste and are required to be kept separate from other waste streams and disposed of in a suitable manner:

- Feminine hygiene: Feminine products (a controlled waste) will be placed in specific bins within the female toilet cubicles. A specialist contractor will be employed to collect and dispose of the waste;
- Clinical waste: Any material containing blood or bodily fluids such as dressings, bandages and clothing is classed as clinical waste and considered to be hazardous. Such items will be placed in specific bins. A specialist contractor will be employed to collect and dispose of the waste;
- Sewage waste: Where sewage facilities cannot be connected to the main sewer network, sewage from welfare facilities and site toilets will be stored on site, collected and disposed of by an appropriately licensed waste carrier as detailed in good practice measure W13 in the CoCP (**application document 7.5.1**);
- Waste electrical and electronic equipment: Redundant computers, monitors and any other waste electrical equipment and classed as hazardous waste. They will be stored separately to other waste streams while awaiting collection by a specialist recycling or disposal contractor; and
- Fluorescent light tubes: These may contain mercury and, as such, are classed as hazardous waste. Waste fluorescent tubes will be separated and securely stored on-site for collection and disposal by a specialist waste contractor.

6.6 Waste Management Records and Handling

6.6.1 Storage of waste on site shall either be within the scope of, and comply with, the requirements of one or more of the activities specified as exempt from Waste Management Licensing; or carried out under an environmental permit issued by the Environment Agency.

6.6.2 All waste will be identified and allocated the appropriate waste code from the European Waste Catalogue (EWC). The assessment will be undertaken by the Site Waste Manager. Waste will be classified using the Waste Acceptance Criteria (WAC) as identified in the EWC designation table. Where required, WAC testing will be undertaken. The purpose will be to confirm that classification is correct in respect to either inert wastes or hazardous wastes. WAC testing may be required for the disposal of inert wastes, such as glass, ceramics and wood, depending on the specific waste handlers' requirements.

6.6.3 Any company collecting waste must be legally authorised to do so. This requires the project to ensure that any company collecting its waste is either:

- Registered as a waste carrier (registered carriers hold a licence which must be checked). Registered waste carriers are licensed by their respective environmental regulator and are issued with a Waste Carriers Licence (valid for three years);

- Exempt from requiring carrier registration; or
- A waste collection authority in England and Wales, waste disposal authority in Scotland or a district council in Northern Ireland (licence not required).

- 6.6.4 Any waste which cannot be used on site will be recycled or disposed of off-site, via a registered carrier to a licensed landfill site, a licensed transfer station, a licensed recycling facility or an exempt site. Every proposed destination site will be checked to ensure that a valid environmental permit or waste exemption has been issued by the Environment Agency for the type of waste to be received. Copies of the relevant permits shall be obtained and saved in the project file storage system.
- 6.6.5 All non-hazardous waste arising from the work carried out by staff will be accompanied with a Waste Transfer Note when passed to a Registered Waste Carrier for removal from a site. All Waste Transfer Notes will be signed by a trained site representative, who will also check the permit or exemption of the registered Waste Carrier using the information held on the Environment Agency's website.
- 6.6.6 A Hazardous Waste/Special Waste Consignment Note will be completed for every movement of hazardous waste. Hazardous Waste/Special Waste Consignment Notes will be signed by a trained site representative. If hazardous waste is being returned to a depot for assessment it will be handled and transported appropriately. A waste carrier's license will also be obtained.
- 6.6.7 All parties involved in the carriage of waste must sign and retain a copy of the transfer documentation. This is a legal requirement, and failure to maintain a record of waste collections can result in prosecution. Completed Waste Transfer Notes and Hazardous Waste Consignment Notes must be kept on file for:
- Waste Transfer Note – two years; and
 - Hazardous Waste Consignment Note – three years.

7. Implementation

7.1 Implementing the MWMP

- 7.1.1 National Grid will put in place robust procedures to inform and supervise all those working on the project including its contractor, to make sure the control measures set out in the MWMP are adopted when undertaking the construction of the project. The main responsibility for implementing these control measures will fall to the contractor.
- 7.1.2 The contractor will brief all operatives on the specific details within the MWMP prior to the commencement of works. The briefings will be delivered by a suitably trained member of the team such as the site supervisor, Construction Manager, Environmental Manager or EnvCoW.

7.2 Site Checks and Reporting

- 7.2.1 Regular site checks will be carried out across the project to monitor compliance with the MWMP. The programme of site inspections will be controlled by the Environmental Manager and implemented by the EnvCoW. The overarching inspections are summarised in Table 7.1. Immediate action including, if necessary ‘stopping a job’, will be taken should any incidents or non-conformance with the MWMP be found during inspection.
- 7.2.2 Site checks and inspections will include checks against compliance with good practice measures in the CoCP (**application document 7.5.1**) and other commitments made by the project. The programme of site inspections will be controlled by the Environmental Manager and implemented by the EnvCoW, who will draw on appropriate suitably experienced specialists for specific tasks.

Table 7.1 – Site Checks Relevant to the MWMP

Inspection Type	Purpose	Who	Frequency
General Site Inspections			
Environmental Inspections	To monitor compliance with project commitments and the environmental standards.	Environmental Manager	Weekly
	To record adherence to good practice measures and raise actions where concerns are identified.	EnvCoW	
	To check mitigation measures for sensitive features are in place.		
Audits (External/Internal)	Formal audit process for internal Management System.	Internal or External Auditor Environmental Manager	Annual
Site Checks	To ensure that working practices are carried out in accordance with approved methods, standards and good practice measures.	Works Supervisor	Daily visual check in working area
Environmental Observations	Allows all staff to raise concerns or good practice ideas to safeguard continual improvement and innovation.	All staff	As required.

Inspection Type	Purpose	Who	Frequency
Material and Waste Management			
Visual inspection	Visual inspection of stockpiles, waste storage and skips. Ensuring secure, appropriately segregated and tidy	Works Supervisor	Weekly
Audits (External/Internal)	Checking conformance with Waste Duty of Care requirements: Undertaking checks of Waste Transfer Notes, waste carrier licenses and ensuring that Environmental Permits are in place for disposal sites	Site Waste Manager	Monthly

- 7.2.3 The results of inspections will be recorded in an Environmental Log. Findings will be disseminated to the wider construction team as appropriate and additional procedures put in place if required.
- 7.2.4 Each quarter, the actual waste figures for the previous period will be updated to enable the project team to review up to date waste data and progress against the project targets.
- 7.2.5 Records will be kept, setting out a description of the waste type and the EWC if appropriate and also the quantities of waste produced. Records will also be kept of the disposal documentation including waste carriers registration number and the transfer and consignment notes, marked with the time and date of collection.
- 7.2.6 The data will be available for review by the relevant planning authorities and the Environment Agency on request.

7.3 Non-Compliance Procedure

- 7.3.1 The EnvCoW will be responsible for undertaking site audits to check compliance with the MWMP and method statements. All incidents associated with the construction of the project, including environmental incidents and non-conformance with the MWMP, will be reported and investigated as per the steps outlined within Section 15.3 of the CEMP (**application document 7.5**).

7.4 Change Process

Introduction

- 7.4.1 The MWMP is one of the plans listed in sub-paragraph (2) of Requirement 4(1) of the draft DCO (**application document 3.1**) which states: *‘All construction works forming part of the authorised development must be carried out in accordance with the plans listed in sub-paragraph (2) below, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned’.*
- 7.4.2 Requirement 1(4) of the draft DCO (**application document 3.1**) states: *‘Where an approval or agreement is required under the terms of any Requirement or a document referred to in a Requirement, or any Requirement specifies “unless otherwise approved” or “unless otherwise agreed” by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given in relation to minor or immaterial changes and where it has been demonstrated to the satisfaction of the relevant highway*

authority or the relevant planning authority that the subject matter of the approval or agreement sought is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement.'

- 7.4.3 Where there is a need to update the MWMP beyond derogations addressed pursuant to the above, the below text addresses the process for changing the MWMP itself. This does not cover changes to the DCO (material or non-material) which would be managed through the process set out in Schedule 6 of the Planning Act 2008.
- 7.4.4 Therefore, the below process is limited to changes to the MWMP.

MWMP Changes

- 7.4.5 It may be necessary to amend the details contained in the MWMP as a result of the iterative discussion and engagement that will continue after the MWMP has been approved. The resulting changes would not alter any of the underlying commitments, mitigations and methodologies set out in the MWMP. An example may be where a preconstruction survey identifies that a measure already committed to is no longer required in the MWMP. In every case, consideration will be given to any changes to the outcome of the assessment of environmental effects.
- 7.4.6 Where there is a proposed change to the MWMP, National Grid will provide details to the relevant planning authority together with evidence of relevant stakeholder engagement, where upon, the relevant planning authority will, acting reasonably, endeavour to respond within 28 days to either confirm its consent to the change to the MWMP or provide its reasons why the change is not accepted. National Grid will also publish any amended version of the MWMP on the project website, and will make clear in doing so that any previous version(s) are superseded.

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