The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

Document 7.5.3: Outline Onshore Construction Environment Management Plan

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

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Date	**Issue**	**Status**	**Description / Changes**
March 2025	A	Final	For DCO submission
September 2025	B	Final	Update to reflect S89(3) Procedural Decision from the Examining Authority

Executive Summary

Ex1.1.1 The Outline Onshore Construction Environmental Management Plan (CEMP) has been prepared on behalf National Grid to support the Application for a Development Consent Order (DCO).

Ex1.1.2 The purpose of the Outline Onshore CEMP is to specify the overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities associated with the Proposed Project on the surrounding environment. It will also ensure that construction activities cause minimum disruption to local residents and members of the public, by helping to create a safe and secure working environment.

Ex1.1.3 On confirmation of a contractor, this Outline Onshore CEMP will be updated to reflect specific proposed construction methods and approved by the relevant authorities. Once approved, this will become the Onshore CEMP, which will be a live document which will continue to evolve and is subject to refinement, amendment, and expansion as necessary.

Ex1.1.4 Compliance with the contents of the Onshore CEMP is secured through Requirement 6 of Schedule 3 of the draft DCO. The Onshore CEMP is intended to provide a systematic approach to environmental management so that environmental risks are identified, incorporated in all decision-making, and managed appropriately.

Ex1.1.5 The Onshore CEMP will be periodically reviewed and updated by National Grid as required, to ensure environmental risks are managed and mitigated throughout.

1. Introduction

1.1 Overview

1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.

1.1.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.1.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.

1.1.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:

- Schedule 9(1)(a) *'…have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest*;' and
- Schedule 9(1)(b) *'…do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'*.

1.1.5 The purpose of a Construction Environment Management Plan (CEMP) is to specify the overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities associated with the proposed Project on the surrounding environment. It will also ensure that construction activities cause minimum disruption to local residents and members of the public, by helping to create a safe and secure working environment. For the purpose of the Proposed Project, an Outline Onshore CEMP (this document) and Outline Offshore CEMP (**Application Document 7.5.2**) has been drafted. More specifically, the Onshore CEMP will:

- ensure that relevant mitigation measures set out in Parts 2 and 3 of the Environmental Statement (ES) as submitted in support of the Development Consent Order (DCO) application are implemented during all relevant construction activities;
- take into account relevant planning policies; and

- ensure that relevant legislation, Government and industry standards, and construction industry codes of practice and best practice standards are complied with.

1.1.6 On confirmation of a contractor, this Outline Onshore CEMP will be updated to reflect specific proposed construction methods and approved by the relevant authorities. Once approved, this will become the Onshore CEMP, which will be a live document which will continue to evolve and is subject to refinement, amendment, and expansion as necessary. Compliance with the Onshore CEMP is secured through Requirement 6 of Schedule 3 of the **draft DCO** (**Application Document 3.1**).

1.1.7 Compliance with the contents of the Onshore CEMP is intended to provide a systematic approach to environmental management so that environmental risks are identified, incorporated in all decision-making, and managed appropriately.

1.1.8 The Onshore CEMP will be periodically reviewed and updated by National Grid as required, to ensure environmental risks are managed and mitigated throughout. Any updates to the Onshore CEMP will be agreed with the relevant authority. In particular, it will be updated to take account of the following:

- changes in design;
- changes in external factors such as regulations and standards;
- any unforeseen circumstances as they arise such as new protected species or new archaeological finds and provide a mitigation framework for this;
- good construction practices and ensure these are adopted and maintained throughout;
- the results of audits and inspections; and
- learning points from environmental near misses and accidents.

1.2 Structure of the Outline Onshore CEMP

1.2.1 The structure of this Outline Onshore CEMP is set out in Table 1.1.

Table 1.1 Structure of the Outline Onshore CEMP

Chapter	Content
Chapter 1: Introduction	This chapter sets out the purpose of the Outline Onshore CEMP and how it is structured. It also provides an overview of the features of the Proposed Project.
Chapter 2: Construction Information	This chapter sets out the construction programme, working hours as well as the onshore construction site layout and good housekeeping.
Chapter 3: Construction Environmental Management Principles	This chapter sets out the construction environmental management principles.

Chapter	Content
Chapter 4: Communication and Consultation Strategy	This chapter sets out the communication strategy, including the complaints procedure.
Chapter 5-15: Topic Chapters	Chapters 5 to 15 are structured as per the environmental topic chapters of the ES. This is to aid cross reference between the assessment and the management measures listed within the Outline Onshore CEMP. Each chapter commences with a succinct summary of where relevant construction phase measures are contained and then sets out any additional information in relation to implementation of identified measures.
Chapter 16: Monitoring and Review	This chapter explains procedures in relation to site checks and reporting and how material or non-material change would be managed, if change were necessary to implement the Proposed Project.

1.3 The Proposed Project

1.3.1 The Proposed Project would comprise the following elements. Whilst a description of the Offshore Scheme is included below, this element of the Proposed Project will be covered by the Offshore CEMP (see **Application Document 7.5.2 Outline Offshore CEMP**).

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a Transition Joint Bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant) near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

1.3.2 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary pylons or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PRoWs) and other ancillary operations.

2. Construction Information

2.1 Overview

2.1.1 This section sets out the detail of the construction programme, proposed construction working hours and the principles for establishing the construction sites and good housekeeping.

2.1.2 Further details on the construction of the Proposed Project can be found in Section 4.6 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** of the Environmental Statement. This includes details of the anticipated methodology for construction of the Proposed Substations, Converter Stations, Overhead HVAC Connection and the Underground HVAC and HVDC Cables. As per Requirement 4(2) within Schedule 3 of the **draft DCO** (**Application Document 3.1**), construction of the Proposed Project '*may not commence until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority*'.

2.2 Construction Programme

2.2.1 Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by 2031 with reinstatement potentially continuing into 2032. Certain advance works (such as archaeological trial trenching or protected species mitigation) may take place in advance of the main construction period.

2.2.2 The construction schedule will be developed as the Proposed Project progresses and will take account of seasonal constraints such as protected species breeding or hibernation seasons and reducing impacts associated with flood zones.

2.2.3 An indicative construction programme for the Proposed Project is presented in Plate 2.1.

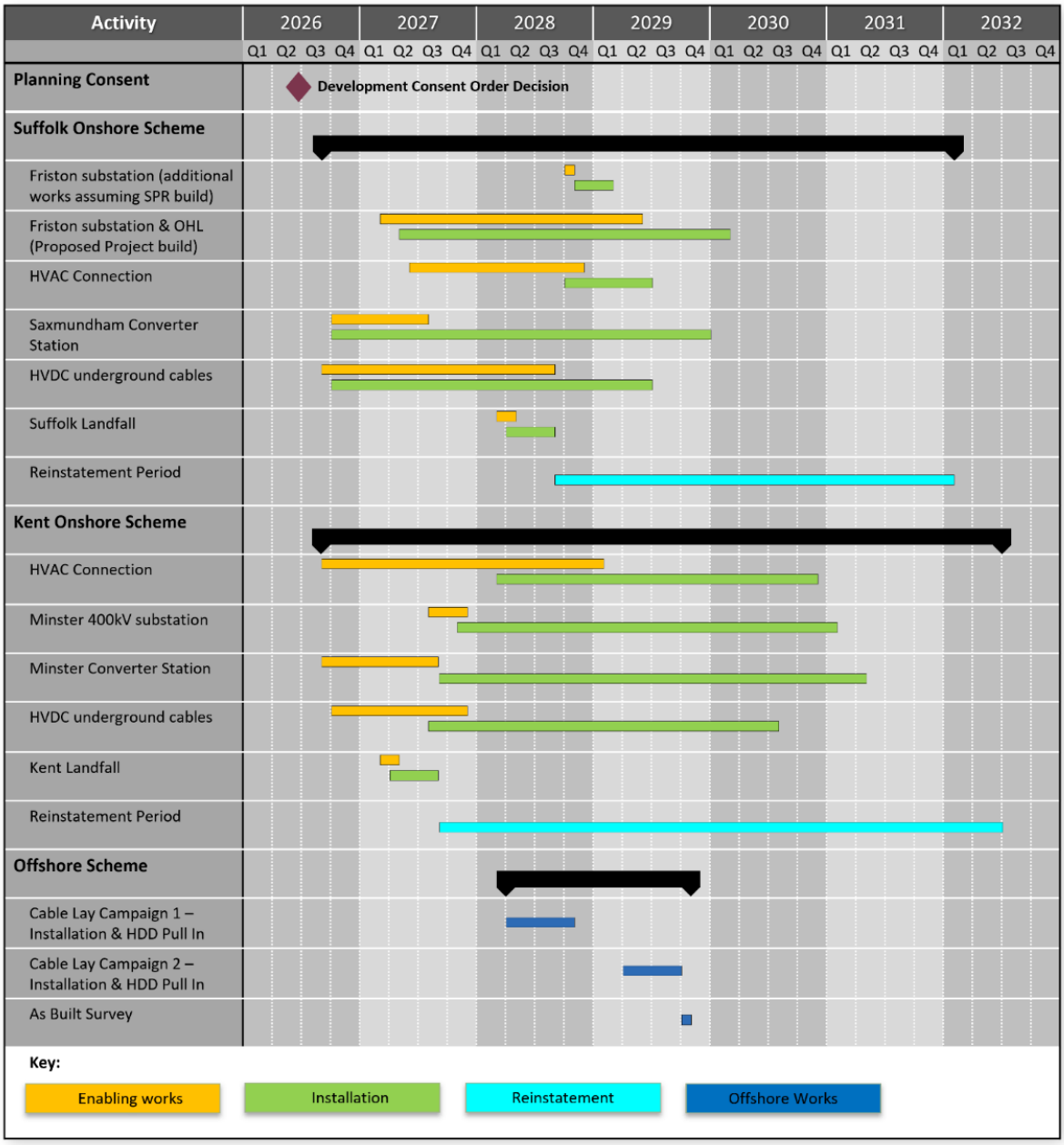

Plate 2.1 Indicative construction programme

2.3 Working Hours

2.3.1 The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Kent and Suffolk are:

- Monday – Friday: 0700 to1900; and
- Saturday, Sundays and Bank Holidays: 0700 to 1700.

2.3.2 The core working hours exclude start up and close down activities up to one hour either side of the core working hours. These activities include staff arrival, briefings, checking plant, loading equipment, compound general maintenance activities, debriefing, storing equipment and plant, and staff leaving site.

2.3.3 Exceptions to the above core working hours include but are not limited to:

- trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses;
- the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses;
- the jointing of underground cables;
- the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused;
- delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours;
- the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;
- the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;
- activity necessary in the instance of an emergency where there is a risk to persons or property;
- marine works (all works below the mean high water springs line);
- security monitoring;
- intrusive and non-intrusive surveys;
- mechanical and electrical installation works within buildings once erected and enclosed;
- any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours; and
- activity necessary in the instance of an emergency where there is a risk to persons or property.

2.3.4 Percussive pilling works would be limited to Monday – Friday: 0700 to 1900 and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the local planning authority.

2.3.5 Subject to the exceptions listed in paragraph 2.3.3 above, Heavy Goods Vehicles (HGV) deliveries would be limited to Monday – Friday: 0700 to 1900 and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant highway authority.

2.3.6 The working hours will be in accordance with Requirement 7 of Schedule 3 of **the draft DCO** (**Application Document 3.1**).

2.4 Onshore Construction Site Layout and Good Housekeeping

2.4.1 The layout, appearance and operation of the construction site, site offices and compounds will be detailed prior to construction commencing and will comply with the commitments in the Outline Code of Construction Practice (CoCP) (see **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**).

2.4.2 Good housekeeping practice will be applied at all times and all working areas will be inspected as required using a site audit programme. A written report on compliance will be provided to National Grid on a monthly basis.

Site Establishment

2.4.3 Site layout and appearance will be designed according to the following principles (further detail provided below):

- installation of fencing where appropriate to secure working areas;
- storage sites, temporary offices, fixed plant, machinery and equipment must be located to minimise environmental impacts, having due regard to neighbouring residential properties and the constraints of each work site;
- noise generating activities must be sited away from noise sensitive receptors or screened; and
- the site layout must also consider and minimise potential impacts from restricting natural light to adjacent residential properties or ecological receptors.

Fencing

2.4.4 Where necessary, working areas will be appropriately fenced off from members of the public and to prevent animals from straying onto a working area. National Grid will ensure, as far as reasonably practicable, that the visual intrusion of the construction site fencing is contained and limited, through limiting fencing to that which is essential for the safety of the public, site personnel and private assets.

2.4.5 Fencing and other means of enclosure, including those required for mitigating effects on protected species, will be inspected daily initially and then regularly as appropriate (protected species fencing is likely to remain as daily), repaired and repainted as necessary. Any temporary fencing will be removed as soon as reasonably practicable after completion of the works.

Lighting and visual intrusion

2.4.6 Construction compounds will not be lit at night outside of the working hours identified for the particular activity (noting that there are exceptions listed in paragraph 2.3.3 which could be undertaken outside of core working hours and during nighttime), except for welfare and site security cabins, which will include low level lighting. Motion sensor lighting will be used in areas of high security risk.

2.4.7 Site or welfare cabins, equipment and lighting will be sited so as to minimise visual intrusion insofar as is consistent with the safe and efficient operation of the work site. Site lighting will be positioned and directed to minimise glare and nuisance to residents and walkers, and to minimise distractions or confusion to passing drivers on railways or adjoining public highways.

2.4.8 Winter working may require task-specific lighting due to the short day lengths when lighting will be required at the beginning and end of the day. Lighting will be used only when required during working hours for particular activities, unless otherwise stated and will comprise lighting of work areas and access and egress with low level directional lighting.

2.4.9 On land where cable jointing is required, there will be a need for 24/7 lighting inside the covered structures that will surround the cable jointing bays. Motion sensor lighting will be required outside the covered structures for security and access and egress purposes.

2.4.10 When lighting is necessary, appropriate lighting and luminaires will be used to minimise the impact of lighting on ecological resources, including nocturnal species. Lighting will be designed to minimise spillage into surrounding habitats, such as sensitive watercourses, to avoid disturbance to wildlife.

Security

2.4.11 Temporary construction compounds including offices will be adequately secured to protect the public and prevent unauthorised entry to or exit from the site. Access to the temporary construction compounds will be limited to specified entry points only and personnel entries/exits will be recorded and monitored for both security and health and safety purposes.

2.4.12 Site-specific assessments of the security and trespass risk will be undertaken at each site and appropriate control measures implemented. In addition, security units and/or remote cameras will be used to monitor sites.

Public rights of way

2.4.13 Parts of both the Suffolk and Kent Onshore Schemes cross a number of Public Rights of Way (PRoW).

2.4.14 **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent** set out the agreed approach to any PRoW diversions or other mitigation required and will be submitted with the DCO application.

2.4.15 The Proposed Project would cross the existing PRoW network. The works which would be required at these locations can be classified into four categories. These are:

- Provisions – at these locations a diversion would not be required. However, safety measures would be put in place to maintain access during the construction period. The installation of safety measures is likely to require short term closures or the control of users using stop go boards or similar, to allow for the installation of fences, gates or overhead netting as required.
- Long term temporary diversion – at these locations a diversion route would be provided for the duration of the construction works.
- Short term temporary diversion – at these locations, the impact on the PRoW is caused by isolated construction activities, so a diversion would only be required for a reduced period of time. These diversions would be implemented within the Order Limits locally to the PRoW affected. For example during the installation of haul roads or ducts across the PRoW, the route would be temporarily diverted 50-100m along the alignment of the Order Limits to cross a section already installed or an area not yet reached by the works.
- Permanent diversion – at these locations the route of the existing PRoW would be impacted by the permanent assets. A permanent diversion route would therefore be required.

2.4.16 In Suffolk, there are 21 locations where the proposed works would impact the existing PRoW network identified in **Application Document 6.3.1.4.A ES Appendix 1.4.A Crossing Schedules** and presented in **Figure 6.4.1.4.5 PRoW, Highway and Railway Crossings** of **Application Document 6.4.1.4 Description of the Proposed Project**.

2.4.17 In Kent, there are 16 locations where the proposed works would impact the existing PRoW network identified in **Application Document 6.3.1.4.A ES Appendix 1.4.A Crossing Schedules** and presented in **Figure 6.4.1.4.5 PRoW, Highway and Railway Crossings** of **Application Document 6.4.1.4 Description of the Proposed Project**.

Welfare

2.4.18 Onsite welfare facilities will be provided for all site workers and visitors. Welfare facilities will be kept clean and tidy.

2.4.19 Where portable generators are used to provide electricity for welfare units, industry best practice will be followed to minimise noise and pollution from such generators.

Waste management

2.4.20 A Material and Waste Management Plan will be produced prior to construction which sets out the framework for the management of wastes generated during the construction of the Proposed Project. The document will set out the decisions taken during the planning and design stages to minimise construction waste and set objectives and targets for the main waste types. The document will also identify the following:

- responsibilities within the construction team for waste management;
- the types of waste (including invasive plant material) and the quantities likely to be generated;
- measures to be adopted during construction to minimise waste generated;
- opportunities for recycling and/or reuse;
- proposed treatment and disposal sites together with details of their Environmental Permit; and
- provisions for staff training and use of the Material and Waste Management Plan.

2.4.21 The aim of the Material and Waste Management Plan is to minimise the volume of waste generated and maximise resource efficiency by applying the waste hierarchy (reduce – reuse – recycle – energy recovery - responsible disposal).

2.4.22 Provision will be made for the recycling of wastes including scrap metal, timber, paper, cardboard, plastics, toner cartridges, batteries in addition to waste oils from equipment and machinery where local schemes are available.

2.4.23 Wastes of different types will be segregated on site through the use of labelled skips, containers or bays indicating the types of waste each may accept and also the European Waste Code. Waste containers shall be in good condition and covered to prevent leachate spillage, waste escaping or ingress of rainwater as appropriate.

2.4.24 Waste disposal will be carried out in accordance with the Waste (England and Wales) Regulations 2011 and Waste: Duty of Care – A Code of Practice (2016), as appropriate to current legislation.

2.4.25 Provision will be made for the correct storage and disposal of Hazardous Wastes as defined by and in accordance with the Hazardous Waste (England and Wales) Regulations 2005 and amendments. The site will be registered as a producer of hazardous waste prior to any transfer of hazardous waste from site and a Hazardous Waste Consignment Note will accompany every transfer. In accordance with the Waste Acceptance Criteria (WAC) hazardous waste may need to be treated, and then tested, before disposal.

2.4.26 Appropriate site investigation and materials testing will be undertaken by specialist consultants prior to construction commencing to identify any 'hazardous waste' as defined in The Hazardous Waste (England and Wales) Regulations 2005 as amended and The List of Waste Regulations 2005 (as amended) so that it can be appropriately managed and disposed of.

Drainage

2.4.27 A Drainage Management Plan (DMP) will be prepared by the contractor prior to the commencement of works. The DMP will demonstrate how the contractor will manage surface water runoff across the worksite during the construction phase, including details of how offsite impacts will be managed and mitigated. This will be developed following detailed drainage investigations and hydrological assessments, which will determine potential location specific risks in relation to the water and natural environment and identify appropriate control measures to reduce the risks.

2.4.28 A phased approach may be taken to the development of the DMP to reflect the phasing of the construction programme and the different elements of the Proposed Project.

Clearance of Site on Completion

2.4.29 All temporary working areas and accesses will be removed when construction has been completed. Plant, temporary cabins and vehicles will be removed from the site.

2.4.30 All temporary land, including highways and public rights of way crossed by the works or other land temporarily occupied will be made good to the satisfaction of landowners and/or the relevant highways authority.

2.4.31 To facilitate reinstatement, a full photographic/aerial footage and descriptive record of condition (pre-condition survey) will be carried out of the working areas that may be affected by the construction activities prior to these works commencing. This record will be available for comparison following completion of reinstatement works to ensure that the standard of reinstatement at least meets that recorded in the pre-condition survey, or as agreed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** and the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent** or if the DCO provides otherwise, then in accordance with the DCO.

2.4.32 Reinstatement details are provided in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** and the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent**.

3. Construction Environmental Management Principles

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 (BS) 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 Roles and Responsibilities

3.2.1 Envisaged roles with defined environmental responsibilities are detailed below. The Onshore CEMP will provide details of all roles relevant to environmental management. An organogram depicting environmental management roles and arrangements will also be provided in the Onshore CEMP.

3.2.2 It is the responsibility of all staff involved with the Proposed Project to ensure the correct implementation of the Onshore CEMP and the environmental mitigation contained within. The Onshore CEMP will include details on roles and responsibilities, however, during the construction phase of the Proposed Project the key environmental responsibilities are likely to be held by the following:

Table 3.1 Outline roles and responsibilities

Role	Responsibilities
Project Manager / Director	Overall environmental management of the Proposed Project, ensuring that all works are carried out in accordance with the Onshore CEMP.
Environmental Advisor / Manager	Work with programme planners and project managers to ensure consents are embedded within the programme. Monitor submission of consent applications and ensure their timely delivery. Provide input to consultation with consent granting bodies, commitment holders and other third parties. Co-ordinate and manage all required scheduled consents. Ensure environmental consents are obtained in line with the programme. Monitor and report progress on consents and commitments.

Role	Responsibilities
	Monitoring construction works for compliance against Environmental Risk Assessment and method statement control measures. Co-ordination of all environmental documentation. Monitoring environmental training, consultation and implementation of contractor procedures. Attending HSE committee meetings. Monitoring of all environmental incidents and ensuring they are reported and investigated. Undertaking audits/inspections, monitor and advise on compliance with duty of care, the Material and Waste Management Plan or any permits and/or exemptions. Monitoring and measurement of waste. Communicate sustainability good practice, innovation and targets to the project team and supply chain. Keep a record of key performance indicators. Act as the main point of contact on environmental matters relating to the Proposed Project.
Community Relations Agency / Public Relations Officer	To advise on dissemination of project material to the public. To track complaints from members of the public and respond within reasonable time frames. To liaise with members of the public regarding issues such as any specific anticipated nuisance.
Engineering Manager	Ensure environmental issues and constraints are included in individual designs, in accordance with environmental design procedures.
Construction Manager	Advising contractor representative on the implementation of the Onshore CEMP. Monitoring construction works for compliance against Environmental Risk Assessment and any method statement control measures. Monitoring environmental training, consultation and implementation of contractor procedures. Accompanying Environment Inspections where required and any environmental authority inspections. Attending Environmental co-ordination meetings.
Works Supervisors	Ensuring that all work is carried out in accordance with project requirements. Ensure that staff under their supervision are aware of their environmental responsibilities. Ensure key risks are identified and brief operatives on environmental topics. Carry out inspections to identify any environmental issues.

Role	Responsibilities
General Operatives	Ensuring environmental mitigation measures are carried out during the course of their duties, in line with project requirements. Working considerately with a good working ethic in order to minimise adverse environmental impacts and follow all requirements communicated during briefings and project training sessions. Informing relevant persons of any environmental issues, so that these can be communicated to the project management team for further investigation. Attending the project induction prior to commencing work where details of the environmental requirements will be provided.

3.3 Competence, Training and Awareness

3.3.1 National Grid will have a system in place to ensure that contractors are competent to perform their scope of work.

3.3.2 Contractors shall identify the training needs of their employees and subcontractors so that they can implement the requirements of this Outline Onshore CEMP (and the Onshore CEMP once agreed) into briefings and construction method statements.

3.3.3 Specific training needs will be developed for individuals to reflect the work to be carried out on the Proposed Project and the significant risks and opportunities identified.

3.3.4 All personnel will be aware of their general environmental management responsibilities, and for those whose work may cause, or have the potential to cause, a significant impact on the environment, to receive specific environmental awareness briefings. Environmental awareness will be reinforced through information, such as poster campaigns, environmental/sustainability performance indicator reports and environmental alerts.

3.3.5 All contractors are responsible for ensuring the competency of their environmental staff. In the event that environmental training is needed for staff, a contractor is responsible for ensuring this requirement is fulfilled. Any training provided to members of the project team will be logged by the project administrator and any certification documents will be produced by the relevant members of staff as evidence that they hold the required competencies.

Toolbox Talks and Training

3.3.6 To provide on-going reinforcement and awareness training, the below topics, along with any other environmental issues which arise, will be discussed at regular toolbox talks. Where applicable to the works the following topics will be included in the induction:

- waste management;
- pollution prevention and control;
- biosecurity;

- environmental measures;
- archaeology; and
- emergency response procedures.

3.3.7 Additional toolbox talks shall be added as required based on circumstances such as unforeseen risks, repeated observation of bad practices, perceived lack of awareness, pollution event, etc.

3.3.8 Records of all toolbox talks and their attendees shall be maintained and recorded.

Health and Safety

3.3.9 National Grid are committed to ensuring the health and safety of persons working on projects is maintained in accordance with the Construction (Design and Management) Regulations 2015 (CDM) and the principles and philosophy behind them.

3.3.10 The contractors will prepare a construction phase Safety Health and Environment (SHE) Plan prior to construction works commencing. A construction phase SHE Plan will be prepared by the contractors for each element of the Proposed Project. The Plan will ensure that adequate arrangements and welfare facilities are in place to cover:

- the safety of construction staff;
- the safety of all other people working at or visiting the construction site;
- the protection of the public in the vicinity of the construction site;
- compliance with the Construction (Design and Management) Regulations 2015 and associated Health and Safety Executive (HSE) guidance documents;
- emergency procedures being defined and adopted; and
- appropriate training and information being provided to personnel.

3.3.11 The contractors' Construction Phase SHE Plan will be reviewed and approved by National Grid prior to construction commencing.

3.3.12 All staff, site visitors and delivery drivers will receive the relevant level of project induction from the contractor to ensure they are aware of site hazards and health, safety and environmental management requirements. Site staff will be briefed daily by the contractor prior to work commencing. Site-specific risk assessments will be carried out to ensure the risk strategy of the frequently changing workplace remains relevant. The contractors will be required to carry out audits and inspections.

3.4 Method Statements

3.4.1 The implementation of Method Statements for the different activities of the Proposed Project works shall be completed by the relevant contractor(s) by trained staff or other appropriate experienced personnel, in consultation with specialists. Their production shall include a review of the environmental/ health and safety risks and commitments, so that appropriate control measures are developed and included within the construction process.

3.4.2 Method Statements will be reviewed by the contractor's Project Manager and, where necessary, by an appropriate environmental specialist. Where appropriate, and if

required or necessary, method statements will be submitted to the relevant regulatory authorities.

3.4.3 Method statements must contain as a minimum:

- location and duration of the activity;
- work to be undertaken and methods of construction;
- plant and materials to be used;
- labour and supervision requirements;
- health, safety and environmental considerations (including relevant control measures); and
- permit or consent requirements.

3.4.4 Deviation from approved method statements (where this is a statutory requirement) will be permitted only with prior approval from relevant parties. This will be facilitated by formal review before any deviation is undertaken.

3.5 Incident Procedure and Response

3.5.1 Contractors will develop and implement an Incident Response Plan which will detail their response in the event of any incident or non-conformance with the Onshore CEMP on site.

3.5.2 The Incident Response Plan will:

- describe the procedure to be followed in the event of an incident (in accordance with the 'Incident Response' procedure below);
- describe the procedure for the notification of appropriate emergency services, authorities and personnel on the construction site;
- describe the procedure for the notification of relevant statutory bodies, environmental regulatory bodies, local authorities and local water and sewer providers;
- provide maps showing the locations of local emergency services facilities such as police stations, fire authorities, medical facilities, other relevant authorities, such as the Environment Agency, and also the address and contact details for each service and authority provide contact details for the persons responsible on the construction site for pollution incident response;
- provide contact details of a competent spill response company which can be contacted at short notice for an immediate response;
- ensure that site drainage plans and flood risk management plans are available on site and are kept up-to-date; and
- ensure staff competence and awareness in implementing plans and using pollution response kit.

3.5.3 All incidents associated with the construction of the Proposed Project, will be reported and investigated using the Incident Response Plan (unless stated differently in other Management Plans).

3.5.4 The following procedure will be followed in the event of an incident or non-conformance with the Onshore CEMP and will be detailed further in the Incident Response Plan.

- works will stop when it is safe to do so;
- the Environmental Manager and Safety, Health, Environment and Quality assurance (SHEQ) Manager will be contacted;
- the scale of the incident will be assessed:
  - if the incident is controllable by staff on Site, remedial action will be taken immediately in accordance with the Plan;
  - if the incident cannot be controlled by the staff on Site, emergency assistance will be sought;
- the appropriate enforcing authority will be contacted and informed, including:
  - the Environmental Agency for incidents affecting rivers, groundwater and major emissions to atmosphere;
  - the East of England Ambulance Service;
  - the local sewerage undertaker for incidents affecting sewers;
  - the Local Authority Environmental Health Department for incidents that could affect the public;
  - the Food Standards Agency for incidents that have the potential to affect food through deposition on crops or land used for grazing livestock;
- an investigation panel will be set up which may include the Senior Project Manager and SHESQ Manager to instigate an investigation into the occurrence of the incident;
- the findings will be sent to the appropriate enforcing authority where necessary; and
- an action plan will be prepared to determine why the incident occurred and whether any modifications to working practices are required to prevent a recurrence. If necessary, the Onshore CEMP and SHE Plan will be updated (and any other plans as appropriate) and all workers will be notified.

3.5.5 The Environment Agency must be notified of a significant pollution incident as soon as possible to allow assessment and remediation measures to be taken. The notifications must be made in the first instance to the Environment Agency incident hotline (0800 80 70 60).

4. Communication and Consultation Strategy

4.1 Community Engagement and Public Information

4.1.1 A community relations agency will be appointed to engage with local residents and provide dedicated community relations and external communications support. The community relations agency will work with the internal established communications team at National Grid.

4.1.2 A free telephone hotline will be available, and a project website will be established and managed by the community relations team. The project helpline number and website URL details will be visible on boards placed around the perimeter of the construction site in appropriate locations where they would be visible to the public. The telephone number and project website details will also be provided to the local authorities.

Complaints Procedure

4.1.3 Any complaints associated with the construction of the proposed development, including non-conformance with the CoCP and other management plans, will be reported, recorded and investigated using a detailed complaints procedure developed by the contractor in consultation with the community relations team.

4.1.4 The detailed complaints procedure (including but not limited to complaints relating to noise, dust, vibration, pollution and construction traffic) will set out:

- how and to whom complaints can be made;
- a reasonable timeframe for responding to complaints;
- the potential remedies available to address complaints; and
- who to contact in the event that the complainant is not satisfied with the outcome.

4.1.5 Primarily any minor issues or complaints relating to site incidents will be dealt with by the contractor. For the escalation of these issues or for more serious issues these will be dealt with by National Grid project team.

4.1.6 The community relations team will ensure the details of any complaints are recorded and all complaints are appropriately managed. Complaints will be investigated, and appropriate action will be taken.

4.1.7 In addition to the project telephone helpline and project website, complaints from an external party may also be received via a number of other communication routes, for example via written correspondence. Any such communications will also be passed to the community relations team.

4.1.8 Where a person from a community local to the works makes a complaint, it will be passed initially to the community relations team. The community relations team will liaise with the other members of the project team to investigate the complaint. Appropriate action will be taken by the project construction team and both the complaint, and the action taken in response, will be recorded.

5. Landscape and Visual

5.1 Introduction

5.1.1 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** consider the potential effects on landscape designations, landscape character areas and visual effects on local communities.

5.1.2 The main effects on landscape and visual receptors during construction comprise the removal of vegetation during construction along with the presence of construction activities within the landscape and views from communities. This chapter should be read alongside the **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** and the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent**, which contain additional information relating to planting and reinstatement.

5.2 Implementation of Mitigation Measures

5.2.1 Construction phase measures that relate to Landscape and Visual are primarily set out and secured in the Outline Landscape and Environmental Management Plans (LEMP) (**Application Document 7.5.7.1 Landscape and Ecological Management Plan – Suffolk** and **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent**). These include construction phase measures in relation to vegetation retention, loss and reinstatement.

5.2.2 The Outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**) also contains general good practice measures and topic-specific control and management measures relevant to the landscape and visual assessment as set out in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**.

6. Ecology and Biodiversity

6.1 Introduction

6.1.1 **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** considers the potential of the Proposed Project on ecology and biodiversity. The receptors considered were statutory designated sites, non-statutory designated sites, terrestrial and aquatic habitats (including ancient woodland and priority habitats), ornithology and other faunal species.

6.1.2 The main effects on ecology and biodiversity receptors during construction include, but are not limited to, the temporary or permanent loss or fragmentation of habitats, direct loss of designated sites, disturbance of birds and other fauna, air quality impacts on designated sites and introduction of non-native species of habitats.

6.2 Implementation of Mitigation Measures

6.2.1 Construction phase measures that relate to Ecology and Biodiversity are included and secured in the Outline LEMPs (**Application Document 7.5.7.1 Landscape and Ecological Management Plan – Suffolk** and **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent**). These include construction phase measures in relation to vegetation retention, loss and reinstatement.

6.2.2 The Outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**) also contains general good practice measures and topic-specific control and management measures relevant to the ecology and biodiversity assessment as set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**. This includes those measures relevant to the control of dust generation and water quality controls in addition to those specifically for the protection of biodiversity.

6.2.3 **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments** also contains embedded and additional mitigation measures which will be implemented during the construction phase as set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**.

7. Cultural Heritage

7.1 Introduction

7.1.1 **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** considers the potential of the Proposed Project on archaeological remains, built heritage and historic landscape assets. The project could affect the historic environment during construction by disturbing known and unknown archaeology during excavation and through the removal of historic landscape features.

7.2 Implementation of Mitigation Measures

7.2.1 Construction phase control and management measures that relate to cultural heritage are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**), with the REAC (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**) listing out additional mitigation to also be followed during construction.

7.2.2 Potential direct impacts on buried archaeological remains would be managed through a programme of additional mitigation which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. The guiding principles and methodology for the planning and implementation of the archaeological mitigation are set out in the **Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation – Suffolk** and **Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation - Kent**, which are to be agreed with the Archaeology Advisors at Suffolk County Council and Kent County Council respectively as part of the DCO process.

7.2.3 This includes a requirement for site-specific Written Scheme of Investigation (WSI) to be produced by National Grid's Archaeological Contractor to achieve the mitigation measures. The site-specific WSI would be agreed with the Archaeology Advisors for Suffolk County Council and Kent County Council, and any other relevant heritage stakeholders prior to the commencement of the archaeological works.

8. Water Environment

8.1 Introduction

8.1.1 **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** considers the potential effects of the Proposed Project on the water environment. In addition, a Flood Risk Assessment (**Application Document 6.8 Flood Risk Assessment**) and Water Framework Directive Assessment (**Application Document 6.9 Water Framework Directive Assessment**) has been produced as part of the application for development consent.

8.2 Implementation of Mitigation Measures

8.2.1 Construction phase control and management measures that relate to the water environment are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the water environment assessment as set out in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment**.

8.2.2 All works within main rivers, ordinary watercourses and board drains will be in accordance with a method approved under environmental permits issued under the Environmental Permitting Regulations by the Environment Agency and /or the relevant secondary consents or permits from the Lead Local Flood Authorities and Internal Drainage Boards. The contractor(s) will also comply with all relevant consent conditions or DCO provisions regarding de-watering and other discharge activities. This will particularly be with regard to volumes and discharge rates and will include discharges to land, water bodies or third-party drains/sewers.

8.2.3 The REAC (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**) also includes embedded mitigation to be followed during construction. This includes commitment W14 which states that the contractor shall develop a Drainage Management Plan. The plan shall demonstrate how the contractor would manage surface water runoff across the construction worksite, including details of how offsite impacts would be managed and mitigated. There is also a commitment W15 for the contractor to prepare a construction phase Flood Management Plan that would consider all construction phase activities and temporary works necessary to deliver the Proposed Project.

9. Geology and Hydrogeology

9.1 Introduction

9.1.1 **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology** considers the potential effects of the Proposed Project on geology and hydrogeology. These chapters assess the potential significance of a number of effects to geology and hydrogeology, including but not limited to, damaging/ causing destruction to sites of geological importance, sterilisation of safeguarded minerals and increasing exposure to existing potential contamination through ground disturbance.

9.2 Implementation of Mitigation Measures

9.2.1 Any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance, and if required, an Abstraction Licence and Environmental Permit (for the discharge) and will be limited to the depth and time required to facilitate construction activities (see GH07 in the outline CoCP).

9.2.2 A drilling fluid breakout plan will be developed by the contractor prior to construction, where horizontal directional drilling is proposed for the Proposed Project, to provide a contingency plan in the event breakout occurs (see GH10 in the outline CoCP). This will form part of the Onshore CEMP.

9.2.3 A full list of the construction phase control and management measures that relate to geology and hydrogeology are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the geology and hydrogeology assessment as set out in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology**.

10. Agriculture and Soils

10.1 Introduction

10.1.1 **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agricultural and Soils** and **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agricultural and Soils** considers the potential effects of the Proposed Project on agriculture and soils. These chapters assess the potential significance of a number of effects to agriculture and soils, including but not limited to temporary removal and loss of BMV land from agricultural production, permanent removal of BMV land from agricultural production and changes to one or more soil function.

10.2 Implementation of Mitigation Measures

10.2.1 Construction phase control and management measures that relate to agriculture and soils are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the agriculture and soils assessment as set out in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agricultural and Soils** and **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agricultural and Soils**.

10.2.2 **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent** sets out specific measures to mitigate damage through the disturbance of in-situ soil materials. It contains specific guidance in relation to soil handling, including, soil stripping, soil stockpiling and soil reinstatement. The Soil Management Plans will be updated prior to construction commencing to include information from soil and agricultural land classification (ALC) surveys and to reflect the final design and construction approach/programme, which is secured by Requirement 6 within Schedule 3 of the **draft DCO** (**Application Document 3.1**).

11. Traffic and Transport

11.1 Introduction

11.1.1 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** considers the potential effects of the Proposed Project on traffic and transport.

11.2 Implementation of Mitigation Measures

11.2.1 Construction phase control and management measures that relate to traffic and transport are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the traffic and transport assessment as set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**.

11.2.2 Construction phase measures that relate to traffic and transport are also described in the **Application Document 7.5.1.1 Outline Construction Traffic Management Plan and Travel Plan – Suffolk** and **Application Document 7.5.1.2 Outline Construction Traffic Management Plan and Travel Plan – Kent** which includes details of their proposed implementation. These identify measures to reduce route and journey mileage to and from and around site, and prevent nuisance to the residents, businesses and the wider community caused by parking, vehicle movements and access restrictions. They also provide suitable control for the means of access and egress to the public highway and set out measures for the maintenance and upkeep of the public highway. The plans also identify access for emergency vehicles and set out measures to reduce safety risks through construction vehicle and driver quality standards and measures to manage abnormal loads.

11.2.3 **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent** outline the measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding PRoW network during all phases of the Proposed Project. Trenchless methods of installation are proposed at the landfalls to minimise potential impacts on the highway and walking/cycling routes.

12. Air Quality

12.1 Introduction

12.1.1 **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** considers the potential effects of the Proposed Project on air quality. These chapters assess the potential significance of a number of air quality effects including but not limited to the impact of dust emissions on human health, soils and ecological receptors and the increase in nitrogen dioxide and particulate matter concentrations at human and ecological receptor locations as a result of emissions from construction vehicles and non-road mobile machinery.

12.2 Implementation of Mitigation Measures

12.2.1 Construction phase control and management measures that relate to air quality are included in the Construction Dust Assessment and Methodology (**Application Document 6.3.2.8.A ES Appendix 2.8.A Construction Dust Assessment and Methodology**) and outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the air quality assessment as set out in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality**.

12.2.2 It includes commitments to develop and implement an Air Quality Management Plan (AQMP) to be approved by the relevant local planning authorities. **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent** are submitted with the application for development consent, setting out the specific mitigation measures required for the construction phase of the Proposed Project. They also include proposed approximate air quality monitoring locations which will be in place for the construction phase of the Proposed Project, which will be used to ensure mitigation measures are working effectively.

12.2.3 Measures relating to construction traffic have been included in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk** and **Application Document 7.5.1.2 Construction Traffic Management Plan and Travel Plan – Kent**.

13. Noise and Vibration

13.1 Introduction

13.1.1 **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** considers the potential effects of the Proposed Project on noise and vibration. Construction noise and vibration attenuates with distance from source. The highest construction noise and vibration impacts will therefore be confined to works that take place in close proximity to receptor locations.

13.2 Implementation of Mitigation Measures

13.2.1 Construction phase control and management measures that relate to noise and vibration are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and topic-specific control and management measures relevant to the noise and vibration assessment as set out in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**.

13.2.2 **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent** (the OCNVMPs) provide the overarching general principles, controls and arrangements that would be applied to the Proposed Project with regards to noise and vibration during construction. Construction phase measures to control and manage noise and vibration during construction are secured via these OCNVMPs. The OCNVMPs cover the requirement for applications for prior consent under Section 61 of the Control of Pollution Act 1974.

13.2.3 As per commitment NV03 in the outline CoCP, the contractor would conduct detailed construction noise and vibration assessments to determine whether additional measures, including site-specific best practicable means, may be required. The OCNVMPs would be updated into NVMPs, incorporating the findings of their detailed assessment and include associated site-specific noise and vibration mitigation as may be required.

14. Socio-economics, Recreation and Tourism

14.1 Introduction

14.1.1 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** considers the potential effects of the project on socio-economics, recreation and tourism. These chapters assess the potential significance of a number of socio-economics, recreation and tourism effects including but not limited to direct and indirect employment opportunities and temporary closure/diversion of Public Rights of Way (PRoW).

14.2 Implementation of Mitigation Measures

14.2.1 Construction phase control and management measures that relate to socio-economics, recreation and tourism are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and traffic and transport specific control and management measures relevant to the socio-economics, recreation and tourism assessment as set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**.

14.2.2 **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent** outline the mitigation measures which will be required to maintain the operation of impacted PRoW. It also details how these mitigation measures will be managed, including who will be responsible for their management. Trenchless methods of installation are proposed at the landfalls to minimise potential impacts on the walking/cycling routes.

14.2.3 The REAC (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**) also includes commitment SE03, which is an embedded measure to programme utility trenching works associated with the ~~Suffolk~~ Kent Onshore Scheme during the school holidays or as agreed with Great Oaks Small School to avoid impacts on users of this receptor.

15. Health and Wellbeing

15.1 Introduction

15.1.1 **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the potential effects of the project on the following health determinants:

- access to healthcare services and other social infrastructure;
- access to open space, leisure and play;
- air quality;
- noise and vibration;
- transport modes, access, connections and physical activity;
- employment and income; and
- social cohesion and community identity.

15.2 Implementation of Mitigation Measures

15.2.1 Construction phase control and management measures that relate to health and wellbeing are included in the outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**). This contains general good practice measures and traffic and transport specific control and management measures relevant to the health and wellbeing assessment as set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**.

16. Monitoring and Review

16.1.1 The Environment Manager will hold the responsibility for maintaining a register of all environmental monitoring, which will be made available for auditing and inspection.

16.1.2 Reporting procedures will be defined by the Environment Manager who will hold overall responsibility for providing feedback to the contractors and National Grid on the environmental performance of the construction works.

Audits and Inspections

16.1.3 Regular monitoring shall occur to ensure compliance with the Onshore CEMP, check compliance with the legal and contractual requirements and to minimise the risk of damage to the environment. All environmental incidents shall be reported to the Environmental Manager.

16.1.4 The Environmental Manager shall assess the works' environmental performance measured against environmental standards, relevant legislation and the Onshore CEMP objectives.

16.1.5 Document control shall be in accordance with a Quality Management System and copies of all environmental audit reports, consents and licences shall be maintained by the contractor's Environmental Manager.

16.1.6 Contractors shall be responsible for investigating and addressing any non-conformances raised by the inspection within an agreed time frame and ensuring that corrective and preventative actions have been fully closed out.

16.1.7 Contractors and National Grid representative shall be responsible for updating and reviewing the Onshore CEMP on a regular basis to ensure continual improvements.

Inspections

16.1.8 The contractor will undertake daily inspections, which will include monitoring. Daily assessment forms will be completed during the daily checks. Checks on equipment will be undertaken to reduce the risk of incidents occurring (for example oil leaks, or biosecurity breaches). As a minimum the following equipment will be inspected:

- fencing;
- waste storage facilities;
- oil separators;
- chemical storage facilities;
- foul water storage facilities;
- silt traps;
- drainage ditches and watercourses;
- storage vessels (including pumps, gauges, pipework and hoses);
- secondary containment (for example, secondary skins for oil tanks);

- spill response materials; and
- equipment with potential to leak oils and other liquids, for example, compressors and transformers.

16.1.9 Weekly inspections will be undertaken by National Grid and the contractors to ensure the daily checks are being undertaken correctly. The daily and weekly inspections will also include:

- reviewing the daily risk assessment forms;
- ensuring that faults and defects are identified and rectified; and
- providing data for performance monitoring.

16.1.10 Environmental performance data will be collected and collated into the SHE Plan by the contractor.

16.1.11 Immediate action including, if necessary, 'stopping the activity in question, where safe to do so', will be taken should any incidents or non-conformance with the Onshore CEMP, be found during inspection. See the earlier Section 3.5 Incident Procedure and Response for further details.

16.1.12 National Grid and the contractors' monitoring reports will be made available to statutory and non-statutory bodies on request.

Change Process

Introduction

16.1.13 The Onshore CEMP is one of the plans listed in Requirement 6(1) of the **draft DCO** (**Application Document 3.1**) which states: 'No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned.'

16.1.14 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 will not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement.'

16.1.15 Where there is a need to update the Onshore CEMP beyond derogations addressed pursuant to the above, the below text addresses the process for changing the Onshore CEMP 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. Therefore, the below process is limited to changes to the Onshore CEMP.

Onshore CEMP Changes

16.1.16 It may be necessary to amend the details contained in the Onshore CEMP as a result of the iterative discussion and engagement that will continue after the Onshore CEMP has

been approved. The resulting changes would not alter any of the underlying commitments, mitigations and methodologies set out in the Onshore CEMP. An example may be where a preconstruction survey identifies that a measure already committed to is no longer required in the Onshore CEMP. In every case, consideration will be given to any changes to the outcome of the assessment of environmental effects.

16.1.17 Where there is a proposed change to the Onshore CEMP, 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 Onshore CEMP or provide its reasons why the change is not accepted. National Grid will also publish any amended version of the Onshore CEMP on the project website and will make clear in doing so that any previous version(s) are superseded.

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