The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.115.2: Outline Materials and Waste Management Plan - Kent

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Executive Summary

Ex1.1.1 This Outline Materials and Waste Management Plan (oMWMP) applies to the Kent Onshore Scheme as part of the Sea Link Project (referred to as the 'Proposed Project'). This oMWMP sets out project-specific measures that will be employed to reduce the consumption of raw materials and uses the mitigation hierarchy to reduce waste sent to landfill.

Ex1.1.2 This oMWMP provides context on the Proposed Project as well as establishing the importance of waste management in construction and development. The defined roles as part of this document ensure accountability and includes the identification of key responsibilities for waste management throughout the Proposed Project lifetime.

Ex1.1.3 This document serves as a framework to mitigate environment impacts to ensure that waste is managed efficiently and sustainably throughout the Proposed Project lifecycle. As such this management plan provides a clear strategy for reducing the consumption of raw materials and waste sent to landfill; this includes guidance on soil excavations and waste transfers.

Ex1.1.4 A MWMP will be developed by the contractor prior to construction commencing substantially in accordance with this Outline MWMP, to include waste arising data and to reflect the final design and construction approach and programme.

1. Introduction

1.1 Introduction

1.1.1 The Proposed Project is a proposal by National Grid Electricity Transmission plc (hereafter referred to the Applicant) to reinforce the transmission network in the Southeast of England and East Anglia. This will 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. This reinforcement would be approximately 138 km long, comprising primarily of a HVDC offshore transmission link, with both HVDC and High Voltage Alternating Current (HVAC) onshore elements.

1.1.2 This outline Material and Waste Management Plan (oMWMP) sets out project-specific measures that will be employed to reduce the consumption of raw materials and uses the mitigation hierarchy to reduce waste sent to landfill. The oMWMP is based on the Proposed Project details available at the time of the application for development consent and outlines practices to be undertaken for the Kent Onshore Scheme. It should be noted that as this is an outline document, certain details (e.g. material quantities) will remain to be developed as the Proposed Project progresses into detailed design. The full details of all measures may not be available until after consent for the Proposed Project has been determined and these will be provided within the final MWMP as necessary. However, the MWMP will need to be in accordance with this oMWMP. The production of a MWMP is secured via Requirement 6 of the DCO (Application Document 3.1 draft Development Consent Order).

1.2 Project Overview

1.2.1 The Proposed Project would comprise the following elements:

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 HVAC underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW 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; and

- A landfall on Suffolk coast (between Aldesburg and Thorrpness).

The Onshore 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.

1.2.2 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 towers 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.

1.2.3 For the purpose of this document, only works associated with the Kent Onshore Scheme will be discussed.

1.2.4 As per measure GG22 within the Register of Environmental Actions and Commitments (REAC), a Material and Waste Management Plan will be submitted to and approved by the local planning authority prior to construction as secured by Requirement 6 in the draft DCO. The contractor(s) will maintain and monitor this plan throughout the construction phase and oversee that any sub-contractor(s) adhere to it. The Material and Waste Management Plan will set out, in an auditable manner, how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy. Dedicated areas will be identified on the construction plans to allow materials and wastes to be segregated at source, reducing the risk of damage or contamination.

1.3 Relevant Policy and Guidelines

1.3.1 In accordance with their published approaches to sustainable design and construction, the Applicant 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, the Applicant seeks ways to use resources more efficiently through good design, use of sustainable materials, responsibly refurbishing existing assets, and reducing and recycling waste. The Applicant's policy has been prepared in accordance with the waste hierarchy.

1.3.3 General measures that will be employed by the Applicant 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 oMWMP:

- WRAP (The Waste and Resources Action Programme), 2008: Achieving good practice Waste Minimisation and Management.
- Department for Environment, Food and Rural Affairs, 2022: Circular Economy Package Policy Statement;
- Contaminated Land: Applications in Real Environment (CL:AIRE), 2011: Definition of Waste Development Industry Code of Practice (CoP) version 2 (referred to in this document as the CL:AIRE CoP);
- Defra, 2011: Government Review of Waste Policy;
- Ministry of Housing, Communities and Local Government (MHCLG), 2014: National Planning Policy for Waste;
- Defra, 2021: Waste Management Plan for England; and
- Kent County Council, 2025: Kent Minerals and Waste Local Plan 2024-39.

1.4 Purpose of the oMWMP

1.4.1 The purpose of the oMWMP 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 oMWMP and associated management plans.

1.4.2 All environmental actions and commitments made in relation to the Proposed Project are outlined in **Application Document 9.84 (B) Register of Environmental Actions and Commitments (REAC) [REP4-235]**. Construction phase measures relevant to materials and waste are also secured within this oMWMP.

1.5 Structure of the oMWMP

1.5.1 The oMWMP structure is set out in Table 1.1.

Table 1.1 oMWMP Structure

Chapter	Content
1. Introduction	This section sets out the purpose of the oMWMP and how it is structured.
2. Proposed Project Materials and Waste Commitments	This section describes the commitments entered into by the Applicant in relation to materials and waste, including the good practice measures in **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]**. It also describes the activities that have been undertaken in terms of designing out waste and sets out the targets for the Proposed Project in relation to materials and waste.
3. Team Roles and Responsibilities	This section sets out the roles and responsibilities relevant to the oMWMP including the site checks and reporting that is proposed.
4. Materials Management	This sets out how materials will be managed on the Proposed 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.
5. Waste Management	This section sets out how waste will be managed on the Proposed 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.
6. Implementation	This sets out the site checks that will be undertaken to monitor compliance of the oMWMP during construction. It also sets out the complaints procedure.

2. Proposed Project Materials and Waste Commitments

2.1 Proposed Project Commitments

2.1.1 The Proposed 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 development of the Proposed 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 The Proposed 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. These measures are captured within the REAC and include the following which are relevant to the management of materials and waste: GG03, GG05, GG11, GG13, GG14, GG22, B04, GH05, GH06.

2.2 Designing out Waste

2.2.1 The Proposed Project has sought to design out waste at each step in the siting and routing process. This has included designing the Proposed 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 Proposed Project that are relevant to use of the waste hierarchy and designing out waste.

2.2.3 The Applicant will continue to seek ways to design out waste through the detailed design and construction phase of the Proposed Project.

Table 2.1 Examples as to how waste has been designed out on the Proposed 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 (subject to agreement with the landowner).	Reduces the need for backfill material to be imported
Temporary access roads materials	Trackway has been assumed as temporary access roads for	Reuses trackway which is higher up the waste hierarchy than

Activity	Method	Resource Saving
	necessary works in Kent. All haul roads will be reviewed by the contractor and the Applicant will encourage the use of trackway where possible and feasible to do so. Trackway can also be reused between projects.	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.
Cable Alignment	Cable alignments have been selected to enable standard straight ducts to be used as far as possible reducing the need for bespoke bends to be fabricated. This can reduce the overall material needs for the project and reduce vehicle movements and reduces waste from cut ends.	Reduced wastage from cutting duct lengths. Reduced fabrication energy, material and cost for bespoke elements. Reduces the number of vehicle deliveries as standard units can be transported more efficiently.
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 **Application Document 7.5.3 Outline Onshore CEMP [AS-127]** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** 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 prefabricated 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 onsite compared to non-prefabricated designs. Metals can be easily sent for recycling at the factory due to existing supply chains. Reduces vehicle

Activity	Method	Resource Saving
		numbers coming to and from site during construction than non-prefabricated design.
Drainage prefabrication	Prefabrication of parts of the drainage systems including headwalls and chambers and watercourse crossings including culverts, in an offsite facility specifically designed to limit waste and raw materials. These can also be brought to site in fewer vehicles than non-prefabricated designs.	Reduces offcuts and waste created onsite compared to non-prefabricated designs. Reduces vehicle numbers coming to and from site during construction than non-prefabricated design. Can be reused when removed after use as part of the temporary works.
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 Proposed Project will be run in compliance with all relevant legislation, consents and permits in accordance with good practice measure GG01 within **Application Document 7.5.3 Outline Onshore CEMP [AS-127]**.

2.3.2 The Environmental Permitting (England and Wales) Regulations 2016 (as amended) (GOV.UK, 2016) require sites where waste is processed, treated or disposed of, to hold a valid environmental permit issued by the Environment Agency (EA).

2.3.3 The Regulations also include a schedule of activities that are exempt from the requirements of permitting. However, to comply with these Regulations, an exempt activity must generally be registered with the EA before commencing.

2.3.4 A permit is not usually required where waste is temporarily stored on the site where it is produced prior to management or disposal. However, depending on the types and quantities of waste to be stored, the duration and place of storage and compliance with other defined conditions, the following exemptions may be required:

- A non-waste framework directive exemption may apply, which does not need to be registered; and
- An exemption may need to be registered with the EA.

2.3.5 The contractor will be responsible for obtaining the necessary permits and exemptions, where required.

2.4 Details of the Proposed Project

2.4.1 The contractor will complete Table 2.2 prior to commencement of construction which will provide a record of project information and where a copy of the MWMP can be found (paper and/or electronic), and for those responsible for waste management.

Table 2.2 Details of the Proposed Project

Project Title	Kent Sea Link	
Project Location	Address	
	Town	
	Postcode	
Client (Applicant)	Name	
	Address	
	Contact	Email
	Phone	Mobile

Project Title	Kent Sea Link		
Principal Contractor	Name		
	Address		
	Contact	Email	
	Phone	Mobile	
MWMP Drafter	Name		
	Address		
	Contact	Contact	
	Phone	Phone	
Construction cost (estimated)			
Site area (gross area)			
Construction programme			
Start date	Day	Month	Year
Completion date	Day	Month	Year
Waste Management Champion			
Person responsible for MWMP			
Document Controller/ Secretary			
Location on MWMP			

2.5 Contaminated Land: Applications in Real Environments (CL:AIRE)

2.5.1 The CL:AIRE Code of Practice (CoP) (2011) was developed to help facilitate the use of excavated materials as non-waste. The CL:AIRE 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 CoP, 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.

2.5.2 **Application Document** 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] 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

2.5.3 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

2.5.4 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 **Application Document 9.31 Agricultural Land Classification (ALC) Survey Results – Kent** submitted at Deadline 5 Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]).

2.5.5 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.

2.5.6 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

2.5.7 The tracking of the movement of materials associated with the project will be investigated, and evidence may be generated to provide an auditable trail.

Site Records

2.5.8 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)

2.5.9 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).

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

Qualified Person Assessment

2.5.11 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.

2.5.12 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.

2.6 Targets for Material Management and Waste Reduction

2.6.1 The Applicant has set out its environmental commitments in ‘Our 2021-2026 Environmental Action Plan’ (National Grid, 2021) and has worked closely with the wider

business to align to the new Environmental Action Plan that will be launching later in April 2026.

2.6.2 These Action Plans have commitments that are relevant to the Proposed Project, and which have been incorporated into to the supplier requirements for the proposed delivery partners.

2.6.3 Examples include:

- Contributing towards low carbon construction delivery: **Application Document 7.5.13 Greenhouse Gas Reduction Strategy [APP-358]** sets out the baseline carbon estimate for the Proposed Project. This will be used as a baseline against which carbon reduction targets for the Proposed Project will be set and agreed. This will include monitoring of energy / fuel usage and recording business travel directly associated with the project. The delivery partners will report on progress against the carbon baseline on the project quarterly.
- The contractor appointed to construct the Proposed Project will have carbon reduction targets.
- The Proposed Project will consider its resource use through activities such as seeking to avoid generating waste through supply chain resource efficiency plans that will document measures taken.
- All waste generated will be managed in accordance with duty of care requirements. The minimisation of sending all avoidable waste streams to landfill and the implementation of circular economy principles will be prioritised.

2.6.4 The performance of the delivery partners against these commitments will be monitored by the applicant during construction.

3. Project Team Roles and Responsibilities

3.1 Environmental Management Systems

3.1.1 The Applicant 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 Proposed Project Responsibilities

3.2.1 The contractor will undertake the construction works in accordance with the DCO and its associated documents including this oMWMP. The relevant aspects of this oMWMP 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 Proposed Project are set out within Application Document 7.5.3 Outline Onshore CEMP [AS-127] and presented in Table 3.1 where relevant to the management of materials and waste. These roles may be delivered by multiple people across the Proposed 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

Role	Responsibilities
Environmental 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
Site Waste Manager	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	A qualified and experienced Environmental Clerk of Works (ECoW) will be available during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the CEMP. The ECoW will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required good practice and mitigation measures. The ECoW will be supported as necessary by appropriate specialists.
Works supervisor	Ensuring that all work is carried out in accord ance with project requirements, including the requirements of the oMWMP. 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.
Technical specialist advisors	These will have the relevant experience to supervise the relevant aspects of the works, which may include a land contamination

Role	Responsibilities
	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 the Applicant 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 5.9 and 5.10) and not able to escape from anyone's control onsite 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, the Applicant, 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 **Application Document 7.5.3 Outline Onshore CEMP [AS-127]**, 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. Material Management

4.1 Introduction

4.1.1 This section sets out the measures that will be undertaken in relation to material management. The Applicant 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.

4.1.2 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.

4.1.3 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.

4.1.4 This chapter sets out the principles for material management that will be followed by the Applicant and its contractor when implementing the project.

4.2 Efficient Material Use During Construction

4.2.1 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 onsite; 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 **Application Document 7.5.3 Outline Onshore CEMP [AS-127]**).

4.2.2 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.

4.2.3 Temporary construction compounds would be established at the converter station and substation site as well as along the HVDC and HVAC underground cable, at the landfall and overhead line routes to facilitate construction activities. In Kent, construction compounds are proposed adjacent to the combined converter station and substation site (construction compounds K01, K02 and K03), A256 Bellmouth (construction compounds K04 and K05), and near the landfall site (construction compound K06). The construction compound at K05 may not be required in the field to the east of the A256 if the offshore cable were to be taken further inland (in that scenario only K04 to the west of the A256 would be required) depending on the final design. These compounds 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.

4.2.4 There may be a need to import a significant amount of material to create the foundation and piling platform for the Minster Converter Station and Susbtation. The Minster 400 kV substation and Minster Converter Station would require approximately 250,000 m^3 of fill and approximately 40,000 m^3 of cut, to create a platform on which the structures would be built. This work is still subject to detailed design and any opportunity to reduce these volumes will be explored.

4.2.5 The working width will also contain designated areas for the storage of soil and space to allow topsoil and subsoil to be stored separately.

4.3 Efficient Water Consumption During Construction

4.3.1 The main uses of water on the Proposed 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.

4.3.2 Temporary construction compounds would be connected to water supplies where reasonable connections can be made to support welfare facilities. If reasonable connections are not available, then water would be tankered to the construction compound. Water for construction activities such as concrete batching or trenchless drilling would be tankered to the construction compound. The location of tinkered supplies would be agreed with the relevant authorities once a contractor supplier has been appointed for the Proposed Project. Foul water will be treated using suitable technology, for example, biodigesters, and/or taken away by tankers as waste.

4.3.3 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.

5. Waste Management

5.1 Introduction and Definitions

5.1.1 This chapter sets out the measures that will be undertaken in relation to waste management. The Applicant and its contractors will adopt the control measures when undertaking the construction of the Proposed Project.

5.1.2 Waste is defined in Article 1 (1) (a) of the Waste Framework Directive (European Parliament and the Council of the European Union, 2008) as 'any substance or object which the holder discards or intends or is required to discard'.

5.1.3 '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.

5.1.4 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.

5.1.5 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.

5.1.6 Waste falls into two main classifications as defined by the Landfill Directive and European Council Decision (2003/33/EC) (Council of the European Union, 2002) 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 (The Council of the European Communities, 1991) of 12 December 1991 on hazardous waste; and
- Non-hazardous waste: This means waste which is not covered by hazardous waste.

5.1.7 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.

5.2 The Waste Hierarchy

5.2.1 The waste hierarchy (Figure 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 Proposed Project will follow this hierarchy.

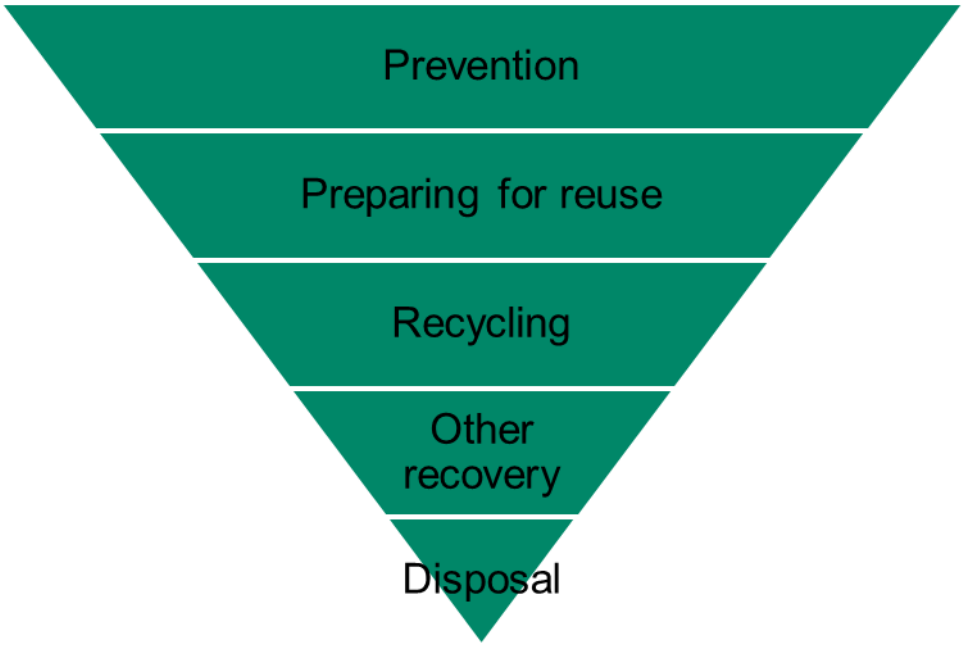

Plate 5.1 The Waste Hirearchy

5.3 Regional Waste Management Facilities

5.3.1 A review of local waste disposal sites has been completed in line with the requirements of National Policy Statement EN-1.

5.3.2 Kent County Councils Minerals and Waste Local Plan 2024-39 (Kent County Councils, 2025) sets out Kent's vision and strategy for waste management capacity over the plan period, including safeguarding existing waste management facilities (Policy CSW 16) and planning sufficient capacity to meet future needs. As such it is indicated that there is no identified shortfall in waste management facilities, and there is sufficient landfill capacity; whilst also championing innovative waste reduction, reuse, and recycling solutions to eliminate future landfill use (Policy CSW2 and CSW4).

5.3.3 The Proposed 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 the Applicant with regards to waste management. Therefore, the levels of waste estimated to be produced by the project will not exceed the waste capacity available in the region and safeguarding of the waste management site will be ensured with no operational restrictions as required by the local policy.

5.4 Waste Management During Design and Construction

Design and Pre-Construction

5.4.1 As outlined in Section 2.2, waste will be considered during the detailed design stage of the Proposed 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

5.4.2 Temporary construction compounds would be established at the converter station and substation site as well as along the HVDC and HVAC underground cable, landfall and overhead line routes to facilitate construction activities. These compounds store all materials necessary for the works, including plant, waste, cable ducts, cable drums and accessories. In addition to storage, compounds also provide a location for site offices, parking and welfare facilities for construction operatives.

5.4.3 In Kent, construction compounds are proposed adjacent to the combined converter station and substation site (construction compounds K01, K02 and K03), A256 Bellmouth (construction compounds K04 and K05), and near the landfall site (construction compound K06). The construction compound at K05 may not be required in the field to the east of the A256 if the offshore cable were to be taken further inland (in that scenario only K04 to the west of the A256 would be required) depending on the final design.

5.4.4 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.

5.4.5 In accordance with good practice measure GG22 within the REAC, dedicated areas will be defined on the construction plans to llow materials and wastes to be segregated at source, reducing the risk of damange or 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 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.

5.4.6 The contractor will implement the good practice measures set out in **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**. This will protect the soil quality and structure of soils temporarily disturbed during construction and allow them to be reused during the reinstatement process.

Reinstatement

5.4.7 In accordance with good practice measure GG07 in **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]** 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 **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**.

5.5 Handling and Disposal of Waste During Construction

Typical Construction Waste

5.5.1 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 onsite 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 invasive non-native species (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. It would also include metal offcuts, such as those from cables, pylons and piling. Metal will be collected and recycled offsite at a recycling facility for disposal.

- Cement and concrete: This is likely to include concrete used in the construction of the Converter Station and Substation, overhead lines and the trenchless technique. 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 offsite.
- 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 compounds 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 offsite 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.
- Flume pipes: The Proposed 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 Proposed Project and either treated and reused, or sent to a recycling facility for disposal, when no longer required.

5.5.2 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

5.5.3 In addition to the general construction waste, there will be offices and welfare cabins at the 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.

5.5.4 The Proposed 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 to an appropriate facility for disposal. General office waste includes biodegradable kitchen and canteen waste.

Unexpected Contaminated Soils

5.5.5 In line with commitment GH08 within **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127],** a protocol will be developed for dealing with any unexpected contamination. Should unexpected contamination be encountered, the material would undergo waste classification prior to removal following the technical guidance outlined in WM3 (Environment Agency, 2021).

Other Controlled and Contaminated Waste

5.5.6 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 onsite and collected and disposed of by an appropriately licensed waste carrier;
- 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 onsite for collection and disposal by a specialist waste contractor.

5.6 Waste Management Records and Handling

5.6.1 Storage of waste onsite 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.

5.6.2 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.

5.6.3 Any company collecting waste must be legally authorised to do so. This requires the Proposed 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).

5.6.4 Any waste which cannot be used onsite will be recycled or disposed of offsite, 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 Proposed Pproject file storage system.

5.6.5 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.

5.6.6 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.

5.6.7 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.

5.6.8 The Contractor will implement the following waste management procedures where practicable:

- All waste containers must be secure and ensure that no waste is allowed to escape;

- All waste containers must be clearly labelled using a colour coding system so that users know what wastes can be placed in each container. Waste containers must be appropriately colour coded using generic colour codes, an example is shown in Plate 2 below;
- Lockable storage will be provided for all hazardous waste;
- All waste containers must be sited at least 10 metres (m) away from watercourses, ditches, and other areas of environmental sensitivity;
- Liquid wastes must be stored in enclosed/lidded containers and stored within a suitable bunded area, or otherwise provided with secondary containment;
- Separate containers must be provided for each type of hazardous waste;
- Each type of hazardous waste must not be mixed with any other hazardous or non-hazardous waste;
- Portable toilet facilities onsite (Portaloo's, etc.) must be emptied by the facility provider as per their service agreement.

5.7 Registration of waste carriers

5.7.1 Under the Control of Pollution (Amendment) Act 1989 (GOV.UK, 1989) it is a criminal offence for anyone not registered as a waste carrier to transport controlled waste. The Waste (England and Wales) Regulations 2011 (as amended) (GOV.UK) updated the system for the registration of waste carriers, including brokers and dealers.

5.7.2 Anyone undertaking any of the following activities as part of their business must register as a waste carrier, broker or dealer:

- Transporting their own waste;
- Transporting waste for someone else;
- Buying or selling waste; or
- Acting as a waste broker (arranging for someone to handle waste produced by someone else).

5.7.3 Details of all appointed waste carriers, brokers and contractors must be included in the detailed SWMP, including copies of appropriate waste carrier licences/registrations. The Register of Waste Carriers, Brokers and Dealers can be checked using the Environment Agency's (EA) online portal of Public Registers (DEFRA, 2022).

5.8 Waste Transfer Notes (WTN)

5.8.1 The Contractor must ensure that all movements of non-hazardous waste, including inert waste from site, are accompanied by a WTN, which will detail specific information. The Contractor's Site Materials and Waste Manager or other competent person will check that each WTN contains the following (where required and relevant):

- The name of the person receiving the waste and what they are authorised to do with that waste as a Registered Waste Carrier can only transport waste;
- Type of waste;
- The Standard Industrial Classification (SIC) code;

- The six-digit EWC code;
- Address of the producing site and details of the waste producer;
- Waste carrier's details including registration number;
- Quantity of waste;
- How it is contained (e.g. 8 cubic yard skip);
- Address of the receiving site (e.g. landfill) and the Environmental Permit or Exemption No. associated with the receiving site;
- The date to which the WTN applies;
- If the material is non-hazardous waste and it is destined for disposal directly to landfill, pre-treatment must have been applied and a declaration detailing the treatment applied appended to the WTN; and
- A declaration that the waste has been treated in line with the requirements of the waste hierarchy.

5.8.2 The site representative signing the WTN must ensure all WTNs are placed in the Site Waste Management File and kept for a minimum period of two years for non-hazardous waste.

5.8.3 By signing a WTN, the site representative is confirming that all the details are correct and that the material is to be sent by a licensed waste carrier to a suitably licensed receiving site, permitted to receive that type of waste. The signature completes the WTN as a legal document.

5.8.4 The Site Materials and Waste Manager or other competent person signing the WTN must additionally ensure that the Waste Carrier is using a suitable vehicle with adequate, covered containment for the waste.

5.9 Waste Consignment Notes (Hazardous Waste)

5.9.1 The generation of hazardous waste is currently indeterminate due to the absence of provided data. Should hazardous waste be produced, the Contractor must ensure that a Hazardous Waste Consignment Note (HWCN) is completed for every movement of hazardous waste. The HWCN must be prepared before the waste is moved. Prior to signing, the Site Materials and Waste Manager or another competent person must ensure that the HWCN includes:

- Hazardous Waste Premises Code;
- Consignment note code;
- SIC Code;
- Name and address of the site from which the waste is being moved;
- Date of removal;
- Type of waste produced, including the quantity and the EWC code;
- The name of the person who is receiving the waste and what they are authorised to do with that waste (e.g. registered waste carrier can only transport waste);
- The final disposal site that is authorised to accept the waste; and

- Retention period for hazardous waste.

5.9.2 The Contractor must retain a copy of the HWCN for a minimum of three years.

5.10 Waste documentation

5.10.1 The Contractor must retain all waste documentation at the temporary site compounds and, following completion of the Proposed Project construction, at the Contractor's head office. This includes:

- The detailed MWMP (two years after end of construction of the Proposed Project;
- Waste transfer documentation (two years for WTNs and three years for HWCNs);
- Copies of any exemptions or permits; and
- Copies of waste carrier and treatment/disposal site licences or permits.

5.11 Fly tipping

5.11.1 Fly-tipping of waste on or adjacent to ongoing construction projects can be a significant issue.

5.11.2 A site assessment of pre-existing fly tipping hotspots within the sites must be undertaken by the Contractor and, where appropriate, security measures to prevent access to such areas will be implemented.

5.11.3 If waste is fly tipped onsite during construction, the Contractor will have a duty of care to ensure it is dealt with safely and disposed of correctly, even if not the producer of the waste.

5.11.4 Regardless of whether the Contractor has fulfilled the obligation in the sentence above, any instance of fly-tipping onsite must be reported by the Contractor to the local authority.

5.12 Fuels, oils and Control of Substances Hazardous to Health (COSHH) Materials

5.12.1 The Contractor must establish appropriate control and management measures for the storage, dispensing, containment and use of all fuels, oils and COSHH materials and wastes that will be required during construction.

5.12.2 The storage, dispensing, containment and use of fuels, oils and COSHH materials have the potential to cause significant damage to the environment. Causes of environmental incidents linked to fuel, oil and COSHH materials on construction sites include:

- Delivery and use of materials;
- Overfilling of storage containers;
- Plant or equipment failure;
- Containment failure;
- Accidents and vandalism; and
- Mixing of inappropriate materials and wastes.

5.12.3 The storage, dispensing, containment and use of all fuels, oils and COSHH materials and wastes shall be undertaken in accordance with regulatory and good practice guidance, the key points of which are set out below.

5.12.4 For COSHH materials and waste, relevant control and management measures may include:

- Storage must be in a secure, bunded and sheltered area;
- Waste must be segregated;
- COSHH liquids must not be stored in areas within Flood Zone 3;
- Areas must be supervised, and records of materials and waste stored and removed from the area recorded; and
- The handling, storage and disposal must be undertaken as described in the COSHH Assessment and any Material Safety Data Sheet (MSDS).

5.12.5 Fuel and oil (including mould oil) shall be stored in accordance with The Control of Pollution (Oil Storage) (England) Regulations 2001 (GOV.UK), with fuels and oil handled in such a way that risk of pollution is minimised, specifically:

- Fuel and oil storage tanks must comply with The Control of Pollution (Oil Storage) (England) Regulations 2001 (GOV.UK) and must be locked outside working hours;
- Storage areas must not be located within 20 m of watercourses, ponds, site drainage or within any areas of Flood Zone 3 or on a gradient;
- Refuelling must not be permitted within 20 m of a watercourse/pond, within 20 m of a highway drainage gully/site drainage, or within areas of Flood Zone 3;
- Mobile bowsers must be bunded/double skinned and must comply with The Control of Pollution (Oil Storage) (England) Regulations (GOV.UK) and must be secured outside working hours;
- Trained operatives must carry out refuelling of plant and equipment;
- Plant nappies must be used during refuelling;
- Storage tanks and drums must be maintained in a good condition, fitted with lids, and labelled to indicate the contents;
- Static combustion engine plant (e.g. compressors, lighting sets) must be integrally bunded or placed on plant nappies;
- Bunds, tanks, pipework and plant must be regularly checked for signs of damage or leaks and must be regularly maintained;
- Spill kits must be provided within close proximity to fuel and oil storage areas, with plant that is operating in isolated areas, and in welfare facilities. Drivers, operators and stores personnel will be trained in security and the use and safe disposal of spill kits; and
- Drums must be stored in bunded areas with a minimum capacity of 25% of the total volume contained within the bund, or 110% of the largest container, whichever is the greater. Where possible, these bunds will be fitted with roofs to prevent the collection of rainwater. Individual drums in use must be stored on a drip tray sufficient to contain 25% of the full capacity of the drum.

6. Implementation

6.1 Implementing the MWMP

6.1.1 As noted above, this is an outline document based on information available at the time of the application and certain details will remain to be developed as the Proposed Project progresses into detailed design. The contractor will develop a full MWMP which will need to be in accordance with this oMWMP. The Applicant will put in place robust procedures to inform and supervise all those working on the Proposed Project including its contractor, to make sure the control measures set out in the MWMP are adopted when undertaking the construction of the Proposed Poject. The main responsibility for implementing these control measures will fall to the contractor.

6.1.2 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.

6.2 Site Checks and Reporting

6.2.1 Regular site checks will be carried out across the Proposed 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 6.1. Immediate action including, if necessary 'stopping a job', will be taken should any incidents or non-conformance with the MWMP be found during inspection.

6.2.2 Site checks and inspections will include checks against compliance with good practice measures in the **Application Document 7.5.3 Outline Onshore CEMP [AS-127]**) and other commitments made by the Proposed 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 6.1 Programme of Site Inspections

Inspection Type	Purpose	Who	Frequency
General Site Inspections			
Environmental Inspections	To monitor compliance with project commitments and the environmental standards. To record adherence to good practice measures and raise actions where concerns are identified. To check mitigation measures for sensitive features are in place.	Environmental Manager EnvCoW	Weekly

Inspection Type	Purpose	Who	Frequency
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
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

6.2.3 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.

6.2.4 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.

6.2.5 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.

6.2.6 The data will be available for review by the relevant planning authorities and the Environment Agency on request.

6.3 Non-Compliance Procedure

6.3.1 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 GG24 and W09 of **Application Document 7.5.3 Outline Onshore CEMP [AS-127].**.

6.4 Change Process

Introduction

6.4.1 The production of a MWMP is a requirement, as stated in Requirement 6 of the Draft DCO. The Applicant's selected contractor will use this outline MWMP to produce their MWMP.

6.4.2 Where there is a need to update the MWMP, the below text addresses the process for changing the MWMP itself. This does not cover changes to the DCO which would be managed through the process set out in Schedule 6 of the Planning Act 2008.

6.4.3 Therefore, the below process is limited to changes to the MWMP (once approved pursuant to Requirement 6 of the DCO).

MWMP Changes

6.4.4 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.

6.4.5 Where there is a proposed change to the MWMP, the Applicant 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. The Applicant will also publish any amended version of the MWMP on the Proposed Project website, and will make clear in doing so that any previous version(s) are superseded.

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