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Outline Site Waste Management Plan

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1. Introduction

1.1 Summary

- 1.1.1 National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales.
- 1.1.2 National Grid has developed plans for Norwich to Tilbury (the 'Project'). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.
- 1.1.3 The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the Local Planning Authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.
- 1.1.4 This document is an outline management plan prepared as an appendix to the Outline Code of Construction Practice (CoCP) (document reference 7.2). It forms part of a suite of outline management plans that provide the preliminary framework for the principles, standards and procedures that the Main Works Contractor(s) must implement to minimise and manage the potential environmental effects of construction activities associated with the Project. This outline management plan will be fully developed based on detailed design and construction methodology information to be provided by the Main Works Contractor(s). The final version will be submitted for approval in accordance with Requirement 4 (construction management plans) of the Draft DCO (document reference 3.1) prior to commencement of development. This process ensures that detailed design is developed with a clear alignment between the Outline CoCP (document reference 7.2), and this outline management plan.
- 1.1.5 This Outline Site Waste Management Plan (SWMP) sets out Project-specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.
- 1.1.6 All pre-commencement operations (as defined in Article 4(1) of the Draft DCO (document reference 3.1)) must be carried out in accordance with the Outline CoCP. In doing so, where any measures referenced in the Outline CoCP are to be agreed with the relevant Local Planning Authority, National Grid and / or its Main Works Contractor(s) must seek the agreement of the relevant Local Planning Authority before carrying out any pre-commencement operations to which those measures are relevant.

1.2 Project Overview

- 1.2.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:
- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB¹))
 - Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
 - Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
 - A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
 - A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
 - Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
 - Ancillary and/or temporary works associated with the construction of the Project.
- 1.2.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).
- 1.2.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.
- 1.2.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies

¹ National Landscape is the rebranded name of an AONB from 22 November 2023

and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

- 1.2.5 The Outline SWMP describes the works undertaken pursuant to the DCO whether this is undertaken by National Grid, UK Power Networks (UKPN) and any appointed Main Works Contractor(s) appointed by these organisations. This document refers to 'the Main Works Contractor(s)' when referring to any organisation responsible for constructing components of the Project (including removal of the 132 kV, 275 kV and 400 kV overhead line).
- 1.2.6 National Grid, UKPN and any appointed Main Works Contractor(s) will carry out all work in accordance with the SWMP during the construction of the Project unless otherwise agreed with the relevant Local Planning Authority.

1.3 Relevant Legislation, Policy and Guidance

- 1.3.1 In accordance with their published approaches to sustainable design and construction, National Grid will seek to maximise resource efficiency, reducing the amount of waste generated, reducing water consumption and making the most efficient use of energy.
- 1.3.2 As part of its Environment Policy, National Grid seeks ways to use resources more efficiently through good design, use of sustainable materials, responsibly refurbishing existing assets, and reducing and recycling waste. National Grid's policy has been prepared in accordance with the waste hierarchy.
- 1.3.3 General measures that will be employed by National Grid and its Main Works Contractor(s) to limit effects on the environment include the following:
- The consumption of raw materials and waste shall be reduced through sound design and good practice in procurement
 - 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 Outline SWMP:
- Achieving Good Practice Waste Minimisation and Management: Guidance for construction clients, design teams and contractors (Waste and Resource Action Programme, 2008)
 - Circular Economy Package Policy Statement (Department for Environment, Food and Rural Affairs (Defra), 2022)
 - Definition of Waste Development Industry Code of Practice (CoP) version 2 (Contaminated Land: Applications in Real Environment (CL:AIRE), 2011), referred to in this document as the CL:AIRE DoW: CoP
 - Government Review of Waste Policy in England (Defra, 2011)
 - National Planning Policy for Waste (Ministry of Housing, Communities and Local Government (MHCLG), 2014)
 - Waste Management Plan for England (Defra, 2021)
 - Waste Classification Technical Guidance WM3 (Guidance on the classification and assessment of waste) (1st edition, 2021).

- 1.3.5 The SWMP will also be cognisant of the following current legislation and be updated with new legislation as and when required
- Waste Framework Directive (Directive 2008/98/EC on waste)
 - The Waste (Circular Economy) (Amendment) Regulations 2020
 - Environmental Protection Act 1990 (as amended)
 - Control of Pollution (Amendment) Act 1989 (as amended)
 - The Waste (England and Wales) Regulations 2011 (as amended)
 - The Waste Management Licensing Regulations 1994 (as amended)
 - The Pollution Prevention and Control (England and Wales) Regulations 2000
 - The Hazardous Waste (England and Wales) Regulations 2005
 - The Environmental Protection (duty of care) Regulations 1991
 - The Waste Electrical and Electronic Equipment Regulations 2013 (as amended)
 - The Control of Substances Hazardous to Health Regulations 2002 (as amended)
 - The Separation of Waste (England) Regulations 2025.

1.4 Purpose of the Outline SWMP

- 1.4.1 The purpose of the Outline SWMP 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 will also set out how the Project will follow the waste hierarchy by reducing waste produced first before considering alternatives such as reuse, recycling and repurposing. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP.

1.5 Structure of the Outline SWMP

- 1.5.1 The Outline SWMP structure is set out in Table 1.1

Table 1.1 Structure of the Outline SWMP

Chapter within this Appendix	Content
1. Introduction	This sets out the purpose of the Outline SWMP and how it is structured.
2. Project Description	This describes the Project commitments made including the mitigation measures in the Outline CoCP (document reference 7.2). It also describes the activities that have been undertaken in terms of designing out waste. It also sets out the targets for the Project in relation to materials and waste.
3. Project Team Roles and Responsibilities	This sets out the roles and responsibilities relevant to the Outline SWMP including the site checks and reporting that are proposed.

Chapter within this Appendix	Content
4. Material Management	This sets out how materials will be managed on the Project. It sets out the measures to reduce consumption of raw materials and encourage use of secondary sources. It also highlights measures to manage water and energy efficiently during construction.
5. Waste Management	This sets out how waste will be managed on the Project. It sets out the measures to employ the waste hierarchy and other commitments that relate to contaminated land risks. It also sets out the documentation that will be used to track and record waste on the Project.
6. Implementation	This sets out the site checks that will be undertaken to monitor compliance of the Outline SWMP during construction. It also sets out the complaints procedure.

2. Project Description

2.1 Project Commitments

- 2.1.1 The Project is the result of a process of iterative design development that was introduced at Project inception. Environmental considerations have had a key influence on the Project, with knowledge gained through the Environmental Impact Assessment (EIA) process, input from the Project team (including the results of site surveys) and discussions with interested parties (such as landowners, relevant Local Planning Authorities and regulators).
- 2.1.2 As explained in Chapter 1 of this appendix, the Project incorporates environmental considerations through measures embedded in the design, standard mitigation (general and topic-specific) measures and additional mitigation measures identified in the Environmental Statement (ES) (Volume 6 of the DCO application).
- 2.1.3 These measures are referenced throughout this Outline SWMP.

2.2 Designing Out Waste

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

Table 2.1 Examples of how waste has been designed out on the Project

Activity	Method	Resource Saving
Removal of pylon foundations	Using a crushing machine to break up the excavated material so that it can be used as suitable backfill. Typically, foundations would be removed to a depth of 1.2 m below ground level.	Reduces the need for backfill material to be imported.
Temporary access roads materials	Trackway has been assumed for removal of the 132 kV, 275 kV and 400 kV overhead line and some locations where new overhead line would be	Reuses trackway which is higher up the waste hierarchy than alternatives such as stone roads.

Activity	Method	Resource Saving
	constructed. Trackway can also be reused between projects.	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 and material required (stone) associated with two-way routes.
Vegetation removal	Reusing vegetation arisings on site in the form of log piles and wood chippings in landscaping where practicable.	Reduces the amount of waste sent off site and also has an ecological benefit on site.
Soil reuse	Commitment to soil handling techniques set out within the Outline Soil Resource Plan (Appendix C of the Outline CoCP (document reference 7.2)) to allow the effective reuse and classification of soils as non-waste.	Reduces soil sent off site and reduces or eliminates soil imported.
Pylons designed and prefabricated off site	Prefabrication of parts of pylons in an off-site facility specifically designed to limit waste and raw materials. These can also be brought to site in fewer vehicles than non-prefabricated designs.	Limits raw material usage and waste created on site compared to non-prefabricated designs. Metals can be easily sent for recycling at the factory via existing supply chains. Reduces vehicle numbers coming to and from site during construction, relative to non-prefabricated design.
Using Computer Aided Design modelling to estimate material quantities	Accurate calculation of material requirement for procurement.	Reduces over production of materials, reduces waste and vehicle numbers coming to and from site.
Procurement seeking use of local suppliers and providers	Using local suppliers and producers to provide materials and services.	Reduces haulage miles and emissions.

2.3 Consents, Licences and Permits

- 2.3.1 The Project will be constructed in compliance with all relevant legislation, consents and permits in accordance with standard mitigation measure GG01 of the Outline

CoCP (document reference 7.2). Where required, permits from relevant Local Planning Authority and/or the Environment Agency, will be sought prior to commencement of the relevant works. Consultation will be undertaken by the Main Works Contractor(s) with the appropriate bodies.

2.4 CL:AIRE

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

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

2.4.2 The Outline CoCP (document reference 7.2) contains standard mitigation guidance for the excavation, handling, storage and final placement of soils. These measures will help protect soils during construction and allow the application of the correct processes for storage and reuse to maintain their classification as non-waste material in the Definition of Waste (CL:AIRE, 2011).

Evidence and Reporting

2.4.3 In order to comply with the requirements of the CL:AIRE DoW: 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
- The verification process, including provision of tracking systems, contingency arrangements, verification testing and reporting.

Resource Requirements

2.4.4 The material resources to be used, including types and quantities, will be based on the requirements of the Project, together with site investigation results indicating the ground conditions and materials to be excavated. In addition, soil surveys have been undertaken to help understand the baseline soil characteristics and to inform the

storage and reinstatement of soils (see ES Appendix 6.1: Agricultural Land Classification Survey Report (document reference 6.6.A1)).

- 2.4.5 The phasing of materials use, management and any measures relating to their use will be outlined and implemented. The reduction of material resources will be achieved through a number of measures such as attention to specifications, timescales for delivery, storage and handling requirements. The method of transporting material resources to reduce road transport will form an important element to this process.
- 2.4.6 The Main Works Contractor(s) will assess the materials to be used on the Project. Where required, 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 off site as waste
 - Material is surplus to requirements and as such will require recovery or disposal off site as waste.

Movement and Tracking Systems

- 2.4.7 The movement of materials associated with the Project will be tracked and evidence generated to provide an auditable trail. The tracking system is anticipated to include:
- Annotated plans of the site identifying excavation areas, stockpile locations, any treatment areas and placement locations
 - Inspection and testing procedures to verify materials are as anticipated from the site investigation information
 - Digitally enabled monitoring systems, or tracking forms and control sheets, to record the movement of materials, including delivery tickets if materials are moving between sites
 - Acceptance and testing procedures if materials are moving between sites.

Site Records

- 2.4.8 The following records will be kept:
- Copies of any relevant licences and permits
 - Details of any planning or consent approvals
 - Material resources tracking, treatment and delivery/ leaving site note records

- Records of any contingency arrangement for materials resources and unforeseen waste arisings that had to be implemented
- Material quantities
- Inspection/ test results.

Verification Plan and Verification Report (CL:AIRE)

- 2.4.9 The Verification Plan will identify how the placement of materials will be recorded and the quantity of materials to be used. The Verification Report is produced to provide an audit trail to show that materials and waste have gone to the correct destination(s).
- 2.4.10 The Verification Report will also document any changes arising from any alterations to the Project or contingency arrangements that had been implemented.

Qualified Person Assessment

- 2.4.11 The assessment will be subject to review and declaration by a QP, who will be registered with CL:AIRE. The assessment will be submitted to the Environment Agency for information and as a record. The declaration serves as notification that having reviewed the evidence relating to the proposed use of materials on site, the QP is satisfied that the CL:AIRE DoW: CoP can be applied appropriately.
- 2.4.12 Subject to acceptance and sign-off of the assessment by the QP, it is assumed that there will be no requirement for the Environment Agency to have any input to the process other than for auditing purposes. This could involve visiting the site and reviewing the assessment documentation, operation and management at the site and at any site(s) receiving the material.

3. Project Team Roles and Responsibilities

3.1 Environmental Management Systems

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

3.2 Project Responsibilities

- 3.2.1 The Main Works Contractor(s) will undertake the construction works in accordance with the DCO and its associated documents including this Outline SWMP. The relevant aspects of this Outline SWMP will be notified to the workforce at commencement of works to highlight the relevant commitments and responsibilities to those undertaking the work.
- 3.2.2 Overall roles and responsibilities for the Project are presented in Table 3.1 of the Outline CoCP (document reference 7.2).

3.3 Duty of Care

- 3.3.1 All waste produced by National Grid and their Main Works Contractor(s) is governed by waste management legislation. Waste producers are any person/ organisation whose activities produce waste. Duty of care is a legal process designed to control the carriage and disposal of waste to ensure it is handled in a responsible manner from 'cradle to grave'.
- 3.3.2 In line with the duty of care requirements, waste produced will be transferred only to an Authorised Person accompanied by a Waste Transfer Note or Hazardous Waste/ Special Waste Consignment Note (see Section 6.6) and will be controlled on site or in transit. An Authorised Person is a registered waste carrier and/or the manager of a legitimate waste management facility, e.g. a waste disposal site. Waste shall not be allowed to leave site unless duty of care checks are successfully completed.
- 3.3.3 Where Main Works Contractor(s) is employed to undertake work that produces waste, it is the Main Works Contractor(s) responsibility as producer of the waste to carry out the duty of care checks. However, National Grid, as the overall developer, retains a duty to ensure that waste is managed in a responsible manner and will ensure that the Main Works Contractor(s) 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 standard mitigation measure GG05 of the Outline CoCP (document reference 7.2), staff and operatives working on the Project will undergo relevant training to increase their awareness of environmental issues as applicable to their role on the Project, which will include the following environmental topics relevant to the SWMP:
- Waste management and storage, including legislation, best practice and segregation
 - Working with potentially contaminated materials.
- 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 Main Works Contractor(s) for all staff where relevant to the role. 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 chapter sets out the principles that will be followed and the measures that will be undertaken in relation to material management. National Grid and its Main Works Contractor(s) will adopt the control measures when undertaking the construction of the Project.
- 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.

4.2 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 to reduce over-ordering and potential wastage. This will include working with manufacturers to reduce the amount of packaging used during the transportation of materials and supporting suppliers who will take back packaging and returns of unused products
 - Sourcing construction materials from suppliers with responsible sourcing certification and using local suppliers where practicable. The use of local suppliers will also reduce transport miles, reducing the carbon footprint of the Project
 - Using 'just in time' deliveries where practicable, so that storage is optimised and to reduce the risk of oversupply and damage on site
 - Managing resource efficiency by storing materials in the correct way to avoid risks of weather impacts, 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 commitments GG20 and GG21 in the Outline CoCP (document reference 7.2).

4.2.2 Timber will be obtained from recycled, reclaimed sources or be accredited to meet sustainable forestry standards such as FSC certification. 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 The working width will also contain designated areas for the storage of soil, and space to allow topsoil and subsoil to be stored separately, in line with the requirements set out in the Outline Soil Resource Plan (SRP) (Appendix C of the Outline CoCP (document 7.2)).

4.3 Efficient Water Consumption During Construction

4.3.1 The main uses of water on the Project will be:

- General water consumption: This includes drinking water for workers, handwashing and washing facilities and flushing of toilets. Water consumption will be reduced by having variable flush toilets, cut-off taps and efficient washing machines where provided
- Trenchless crossings: Non-potable water will be used as a preference for the trenchless crossings. It is assumed that this would be brought to site in tankers
- Dust suppression: Non-potable water will be used as a preference to suppress dust generated during the work, particularly during dry spells
- Cleaning of roads and working areas: Non-potable tankered water will be used to clean roads and working areas. Similarly for dust suppression, reuse of water will be sought.

4.3.2 The temporary construction compounds may be connected to mains water supply and use suitable treatment measures such as biodigesters for wastewater or for this to be taken away by tankers. The satellite compounds are likely to have water deliveries to supply potable water to welfare facilities and foul water will be treated using suitable technology, for example, biodigesters, and/or taken away by tankers as waste.

4.3.3 Temporary construction compounds will be provided with standard mitigation measures for water conservation, for example the use of water-efficient taps within welfare facilities, waterless toilet facilities, assessment of whether water can be reused, and regular checks to hoses for water leaks. Further details on water use can be found in the Outline CoCP (document reference 7.2).

5. Waste Management

5.1 Introduction and Definitions

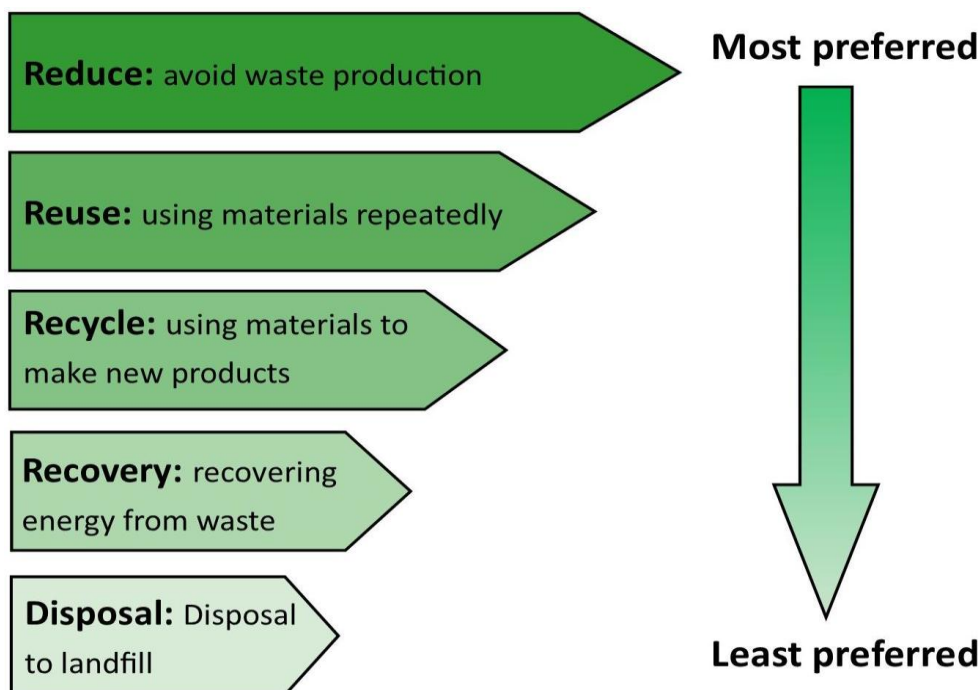
- 5.1.1 This chapter sets out the measures that will be undertaken in relation to waste management. National Grid and its Main Works Contractor(s) will adopt the control measures when undertaking the construction of the Project. This chapter should be read alongside the Outline CoCP (document reference 7.2).
- 5.1.2 Waste is defined in Article 1 (1) (a) of the Waste Framework Directive (2008/98/EC) as *'any substance or object which the holder discards or intends or is required to discard'*.
- 5.1.3 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.
- 5.1.4 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.
- 5.1.5 Waste falls into two main classifications as defined by the Landfill Directive and European Council Decision (2003/33/EC) for the purposes of management and disposal.
- Hazardous waste: This means any waste which is covered by Article 1(4) of Council Directive 91/689/EEC of 12 December 1991 on hazardous waste
 - Non-hazardous waste: This means waste which is not covered by hazardous waste legislation.
- 5.1.6 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 households
 - 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, as shown in Image 5.1, is designed as a process, which starts with measures to avoid the production of waste in the first place, through reuse,

recycling and recovery, so that the least amount of waste is sent for disposal. The Project will follow this hierarchy.

Image 5.1 The waste hierarchy



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 the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2024).
- 5.3.2 Norfolk County Council adopted the Norfolk Minerals and Waste Local Plan on 20 May 2025. The Plan concluded, following an assessment of the existing waste management capacity in Norfolk, that sufficient capacity already exists to accommodate the forecast growth in waste arisings over the Plan period to 2038.
- 5.3.3 Suffolk County Council's Minerals and Waste Local Plan (2020) draws on the Suffolk Waste Study 2018. This indicates that there is no identified shortfall in waste management facilities, and there is sufficient landfill capacity within Suffolk to last until the end of the Plan period in 2036.
- 5.3.4 The Essex and Southend-on-Sea Waste Local Plan (Essex County Council and Southend-on-Sea Borough Council, 2017) identifies that there is a need for an additional (recycling or disposal) capacity, partly due to the expiry of existing temporary planning permissions, to meet the forecasted increase in waste management needs for waste streams up to 2032. The current capacity of inert landfill across the county is 5.1 Mt. This is not sufficient to accommodate both the needs of the Plan area and the inert waste projected to be imported from London. Even after the allocation of all sites suitable for inert waste recycling and inert waste landfill, there is a further need to find management solutions for a further 7.05 Mt of inert waste.

- 5.3.5 The Project would not generate large quantities of waste for landfill, due to the nature of the waste anticipated (large proportions of which can be reused or recycled) and also due to the targets set by National Grid with regard to waste management. Essex County Council is forecasting to be at capacity over the plan period, however there is landfill capacity within Norfolk and Suffolk, within which the majority of the Project lies. Therefore, the levels of waste estimated to be produced by the Project will not exceed the waste capacity available in the region.

5.4 Waste Management During Design and Construction

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

Design and Pre-construction

- 5.4.2 As outlined in Section 2.2, waste will be considered during the detailed design stage of the Project as part of seeking further opportunities to design out waste at source. The Main Works Contractor(s) 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 Main Works Contractor(s) will use the detailed design drawings to inform the procurement strategy so that the right quantities and types of material are ordered. These steps will reduce waste being created in the first place.

Site Planning and Preparation

- 5.4.3 The temporary construction compounds will contain designated waste storage areas, in accordance with commitment GG18 in the Outline CoCP (document reference 7.2).
- 5.4.4 When planning the layout of the temporary construction compounds, the Main Works Contractor(s) would consider the phasing of the overall project in terms of the types of waste that may be generated and managed at different stages of development, and how these relate to on-site storage and management.
- 5.4.5 Materials will be reused where practicable, for example, temporary site cabins and fencing can be reused on different construction projects. This can also apply to temporary site matting (such as trackway) used in temporary access routes and plastic or concrete pipes used in temporary culvert crossings. Materials will be suitably stored to avoid damage.
- 5.4.6 In accordance with commitment GG27 in the Outline CoCP (document reference 7.2), waste will be stored separately to avoid cross contamination. The type of waste will dictate the containers and laydown areas required to facilitate safe storage including measures to avoid the risk of pests and vermin. Storage containers will be labelled to indicate the type of waste or materials that may be deposited in them. Contaminated or hazardous waste will have separate designated areas within the main site compound to avoid the risk of contaminating other material and waste streams. Handling and storage of these will be dependent on the level, type or classification of the waste.
- 5.4.7 The Main Works Contractor(s) will implement the mitigation measures for agriculture and soils set out in the Outline CoCP (document reference 7.2) and the Outline SRP (Appendix C of the Outline CoCP (document reference 7.2)). This will protect the soil

quality and structure of soils temporarily disturbed during construction and allow them to be reused during the reinstatement process. Where soil is potentially contaminated, it will follow the measures outlined in Section 5.5.

Reinstatement

- 5.4.8 In accordance with commitment GG07 in the Outline CoCP (document reference 7.2), land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition discussed with the landowner). Any topsoil or subsoil removed to facilitate construction will be reused (where suitable) and replaced in accordance with measures detailed in the Outline SRP (Appendix C of the Outline CoCP (document reference 7.2)).

5.5 Handling and Disposal of Waste During Construction

Typical Construction Waste

- 5.5.1 During construction, various wastes will be created during the works. This is likely to include the following sources (which will be stored separately to avoid cross contamination) and likely waste management methods:
- Vegetation arisings: Green waste will be created from the clearance of trees and vegetation within the working area. Some of these arisings may be retained on site where the landowner agrees and this is identified as having a clear ecological benefit. In such cases, vegetation may be left to form deadwood 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 recycling facility where suitable i.e. not containing Invasive Non-Native Species (INNS)
 - Cable drums: That these would be returned to the cabling supplier for reuse on other projects where practicable
 - Mixed metal such as aluminium and steel: Steel and aluminium are recyclable with a high degree of efficiency and will include the conductors and pylons removed as part of the dismantling of the redundant parts of the 132 kV, 275 kV and 400 kV overhead lines. It would also include metal offcuts, such as those from cables, pylons and rebar used when piling. Metal will be collected and recycled off site at a recycling facility
 - Highways material including asphalt and bitumen: Spoil excavated during the cable trenches within highways or private roads will be segregated and tested. It will then be disposed of at a specialised recycling facility as required. Suffolk County Council has noted that due to the age of many local roads there is a risk that bituminous materials may contain coal tar. Therefore, appropriate screening of core samples to detect the presence of coal tar is strongly recommended where excavation of the carriageway is required
 - Cement and concrete: This is likely to include concrete used in the foundations of the redundant parts of the 132 kV, 275 kV and 400 kV overhead lines. It is anticipated that cement or concrete arisings will be collected and recycled as hardcore at a recycling facility. Cement washings will be collected into a designated area and disposed of off site

- **Wooden formwork/temporary works:** All wooden formwork/ temporary works or support timbers such as those used within the drilling pits or foundations, where clean, will be collected and reused or sent to a recycling facility.
- **Crushed stone:** It is anticipated that virgin crushed stone will be used during the temporary works and will include the surface of the temporary construction compounds, temporary haul roads, 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 projects or sent to a recycling facility
- **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 temporary construction compound welfare facilities will be discharged to sewer, subject to the agreements with the utility providers. In locations where a sewer connection is not reasonably practicable, wastewater will be collected and tankered off site for disposal at a licensed treatment facility
- **Construction and post-construction drainage materials:** Plastic, concrete, brick and stone-based materials will be used as part of the construction and post-construction drainage installation. Waste generated from these will be collected and sent to a recycling facility for treatment and disposal
- **Culverts:** The Project will be using a number of culverts as part of the temporary works at watercourse crossings. These can be made of various materials depending on the size and purpose. Where practicable through the length of the Project, culverts will be reused, and 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 temporary construction compounds. The following items will be separated in dedicated bins so that they can be recycled at an appropriate waste facility:

- Dry recyclables:
- Paper and cardboard
- Metal such as aluminium cans
- Plastic
- Glass (not including bulbs and fluorescent tubes)
- Food waste

- Ink cartridges and toner cartridges
- Batteries.

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

Unexpected Contaminated Soils

5.5.5 ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) identified that during construction there is the potential for unexpected contamination to be encountered.

5.5.6 Commitment GH08 of the Outline CoCP (document reference 7.2) states that a protocol for dealing within any unexpected contamination will be developed by the Main Works Contractor(s) and include details of a watching brief and toolbox talks to be implemented throughout the construction phase.

5.5.7 Details will be agreed with the Local Planning Authority regarding:

- How any affected area will be delineated, protected, investigated and assessed
- The qualifications and competencies of the person appointed to oversee the works
- The preparation of a method statement for how the contamination will be dealt with or remediated (as appropriate)
- An escalation policy describing when and how any notifications and approvals
- Verification procedures for any mitigation or remediation works.

5.5.8 If, following the assessment, materials are assessed as being unsuitable for use due to contamination, this material would need to be treated to facilitate reuse, or removed from the site as a waste. The material would undergo waste classification prior to removal following the technical guidance outlined in WM3 (Environment Agency, 2021).

Other Controlled and Contaminated Waste

5.5.9 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:

- Hygiene: Hygiene products (a controlled waste) will be placed in specific bins within the toilet cubicles. A specialist contractor will be employed to collect and dispose of the waste
- Clinical waste: Any material containing blood or bodily fluids such as dressings, bandages and clothing is classed as clinical waste and considered to be hazardous. Such items will be placed in specific bins. A specialist contractor will be employed to collect and dispose of the waste
- Sewage waste: Where sewage facilities cannot be connected to the main sewer network, sewage from welfare facilities and site toilets will be stored on site,

collected and disposed of by an appropriately licensed waste carrier as detailed in commitment W16 in the Outline CoCP (document reference 7.2)

- Waste electrical and electronic equipment: Redundant computers, monitors and any other waste electrical equipment is classed as hazardous waste. They will be stored separately to other waste streams while awaiting collection by a specialist recycling or disposal contractor
- Fluorescent light tubes: These may contain mercury and are therefore classed as hazardous waste. Waste fluorescent tubes will be separated and securely stored on- site for collection and disposal by a specialist waste contractor.

5.6 Waste Management Records and Handling

- 5.6.1 Storage of waste on site shall either be carried out under an environmental permit issued by the Environment Agency, or shall be within the scope of, and comply with the requirements of one or more of the activities exempt from waste management licensing.
- 5.6.2 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.
- 5.6.3 Any company collecting waste must be legally authorised to do so. This requires the Project to ensure that, as appropriate, any company collecting its waste:
- Is 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 Carrier Licence (valid for three years)
 - Is exempt from requiring carrier registration
 - Is a waste collection authority in England and Wales
 - Has the appropriate type of licence.
- 5.6.4 Any waste which cannot be used on site will be recycled or disposed of off site, via a registered carrier to a licensed landfill site, a licensed transfer station, a licensed recycling facility or an exempt site. Every proposed destination site will be checked to ensure that a valid environmental permit or waste exemption has been issued by the Environment Agency for the type of waste to be received. Copies of the relevant permits shall be obtained and saved in the Project file storage system.
- 5.6.5 All non-hazardous waste arising from the work 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.
- 5.6.6 A Hazardous Waste Consignment Note will be completed for every movement of hazardous waste. Hazardous 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 licence 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 must be kept on file for two years. Hazardous Waste Consignment Notes must be filed for three years.

6. Implementation

6.1 Implementing the SWMP

- 6.1.1 National Grid will put in place robust procedures to inform and supervise all those working on the Project including its Main Works Contractor(s), to make sure the control measures set out in the SWMP (to be developed by the Main Works Contractor(s)) are adopted when undertaking the construction of the Project. The main responsibility for implementing these control measures will fall to the Main Works Contractor(s).
- 6.1.2 The Main Works Contractor(s) will brief all operatives on the specific details within the SWMP prior to the commencement of works. The briefings will be delivered by a suitably trained member of the team such as the Environmental Manager or Works Supervisor.

6.2 Site Checks and Reporting

- 6.2.1 Regular site checks will be carried out across the Project to monitor compliance with the SWMP. The programme of site inspections will be controlled by the Environmental Manager. 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 SWMP be found during inspection.
- 6.2.2 Site checks and inspections will include checks for compliance with mitigation measures set out in the Outline CoCP (document reference 7.2) and other commitments made by the Project. The programme of site inspections will be controlled by the Environmental Manager and implemented by the Environmental Clerk of Works (EnvCoW), who will draw on appropriate suitably experienced specialists for specific tasks.

Table 6.1 Site checks relevant to the SWMP

Inspection Type	Purpose	Individual	Frequency
General Site Inspections			
Environmental Inspections	To monitor compliance with Project commitments and the environmental standards. To record adherence to standard mitigation 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	Individual	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 standard mitigation 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

Material and Waste Management

Visual inspection	Visual inspection to ensure stockpiles, waste storage and skips are 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 licences 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 The data will be available for review by the relevant Local Planning Authorities and the Environment Agency on request.

6.3 Non-Compliance Procedure

6.3.1 The Environmental Manager will be responsible for undertaking site audits to check compliance with the SWMP and method statements. All incidents associated with the construction of the Project, including environmental incidents and non-conformance with the SWMP, will be reported and investigated as defined within Section 7 of the Outline CoCP (document reference 7.2). Further detail will be included in the Code of Construction Practice to be developed by the Main Works Contractor(s).

6.4 Change Process

6.4.1 The CoCP is one of the plans listed in Requirement 4 of the Draft DCO (document reference 3.1).

- 6.4.2 Requirement 4(1) of the Draft DCO (document reference 3.1) 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 (in consultation with Natural England in the case of the landscape and ecological management plan) or other discharging authority as may be appropriate to the relevant plan concerned.’*
- 6.4.3 Where there is a need to update the CoCP beyond derogations addressed pursuant to the above, the below text addresses the process for changing the CoCP 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.
- 6.4.4 Therefore, the below process is limited to changes to the CoCP.

CoCP Changes

- 6.4.5 It may be necessary to amend the details contained in the CoCP as a result of the iterative discussion and engagement that will continue after the CoCP has been approved. The resulting changes would not alter any of the underlying commitments, mitigations and methodologies set out in the CoCP. An example may be where a preconstruction survey identifies that a measure already committed to is no longer required in the CoCP. In every case, consideration will be given to any changes to the outcome of the assessment of environmental effects.
- 6.4.6 Where there is a proposed change to the CoCP, National Grid will provide details to the relevant Local Planning Authority together with evidence of relevant stakeholder engagement, where upon, the relevant Local Planning Authority will, acting reasonably, endeavour to respond within 28 days to either confirm its consent to the change to the CoCP or provide its reasons why the change is not accepted.

Abbreviations

Abbreviation	Full Reference
AIS	Air Insulated Switchgear
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CL:AIRE	Contaminated Land: Applications in Real Environment
CoCP	Code of Construction Practice
CSE	Cable Sealing End
DCO	Development Consent Order
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
EnvCoW	Environmental Clerk of Works
ES	Environmental Statement
FSC	Forest Stewardship Council
GIS	Gas Insulated Switchgear
INNS	Invasive Non-Native Species
km	kilometre
kV	kilovolt
MHCLG	Ministry of Housing, Communities and Local Government
NETS	National Electricity Transmission System
NSIP	Nationally Significant Infrastructure Project
QP	Qualified Person
SQSS	Security and Quality of Supply Standard
SRP	Soil Resource Plan
SWMP	Site Waste Management Plan
UKPN	United Kingdom Power Networks
WAC	Waste Acceptance Criteria

Glossary

Term	Description
Biodiversity Net Gain	An approach for developments to ensure habitats for wildlife are left in a measurably better state than they were before the development.
Cable Sealing End Compound	Electrical infrastructure used as the transition point between overhead lines and underground cables. A compound on the ground acts as the principal transition point.
CL:AIRE	A clear, consistent and efficient process which enables the reuse of excavated materials on-site or their movement between sites.
Code of Construction Practice	A code of construction practice sets out the standards and procedures to which a developer (and its contractors) must adhere in order to manage the potential effects of construction works.
Construction Traffic Management Plan	Plan detailing the procedures, requirements and standards necessary for managing the traffic effects during construction of the Project so that safe, adequate and convenient facilities for local movements by all transport modes are maintained throughout the construction process.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Environmental Impact Assessment (EIA)	An assessment of the likely effects of a development project on the environment, which is reported in an Environmental Statement that is publicised and consulted on and taken into account in the decision on whether a project should proceed.
Environmental Statement	The main output from the EIA process, an ES is the report required to accompany an application for development consent (under the Infrastructure Planning (EIA) Regulations 2017) to inform public and stakeholder consultation and the decision on whether a project should be allowed to proceed. The EIA Regulations set out specific requirements for the contents of an ES for Nationally Significant Infrastructure Projects.
Kilovolt	1,000 volts
Main Works Contractor(s)	Contractor(s) appointed by National Grid to construct the Project
National Landscape (an Area of Outstanding Natural Beauty)	Formally designated under the National Parks and Access to the Countryside Act 1949 to protect areas of the countryside of high scenic quality that cannot be selected for National Park status due to their lack of opportunities for outdoor recreation

Term	Description
	(an essential objective of National Parks). As of November 2023, all AONBs became 'National Landscapes'. This reflects ambitions for the areas to play a key part in the international '30 by 30' commitment (to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030).
Public Right of Way (PRoW)	A footpath, bridleway or byway accessible to all members of the public.
Qualified Person	must review the evidence relating to the proposed use of materials on a specific site and if satisfied, will sign a Declaration and submit it to CL:AiRE. In order to act as a Qualified Person an individual must possess certain attributes which are fully outlined in the CLAiRE Code of Practice DoWCoP and a formal qualification and registration is required.
Registered Waste Carrier	The Control of Pollution (Amendment) Act 1989 and the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 require that any person who transports/makes arrangements for management of waste in the course of any business without being registered with the appropriate registration authority commits an offence, unless they are exempt.
UK Power Networks	UK Power Networks (Operations) Limited (registered company number 03870728) and/or its affiliate Eastern Power Networks plc (registered company number 02366906) as applicable.
Waste Consignment Note	A legal document that accompanies the transport of hazardous waste in the UK

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