

Intermodal Logistics Park North Ltd

INTERMODAL LOGISTICS PARK NORTH (ILPN)

Intermodal Logistics Park North (ILPN) Strategic Rail Freight Interchange (SRFI)

Project reference TR510001

Outline Construction Environmental Management Plan (oCEMP)

October 2025

Planning Act 2008

**The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Regulation 14**

This document forms a part of a Preliminary Environmental Information Report (PEIR) for the Intermodal Logistics Park North (ILPN) project.

A PEIR presents environmental information to assist consultees to form an informed view of the likely significant environmental effects of a proposed development and provide feedback.

This PEIR has been prepared by the project promoter, Intermodal Logistics Park North Ltd. The Proposed Development is described in Chapter 3 of the PEIR and is the subject of a public consultation.

Details of how to respond to the public consultation are provided at the end of Chapter 1 of the PEIR and on the project website:

<https://www.tritaxbigbox.co.uk/our-spaces/intermodal-logistics-park-north/>

This feedback will be taken into account by Intermodal Logistics Park North Ltd in the preparation of its application for a Development Consent Order for the project.

◆ Outline Construction Environmental Management Plan

INTRODUCTION AND PROJECT

- 1.1 Intermodal Logistics Park North Ltd. ('the Applicant') is promoting proposals for a new strategic rail freight interchange (SRFI) and associated development on land to the east of Newton-le-Willows, in the jurisdictions of St Helens Borough Council, Wigan Council and Warrington Borough Council. The Proposed Development is termed Intermodal Logistics Park North Rail Freight Interchange (ILPN SRFI).
- 1.2 The Proposed Development is for a new SRFI. A SRFI is a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems. SRFIs reduce the cost of moving freight by rail and encourage the transfer of freight from road to rail. The essential components of an SRFI development include direct connections to the rail network which connect to ports at which freight is imported and exported, and high quality strategic road connections to the region or regions that the interchange will serve.
- 1.3 The DCO Site is located on the eastern extent of Newton-le-Willows. The majority of the land contained within the Main Site is bound to the north by the Chat Moss Line (Liverpool-Manchester railway line), to the west by the M6 motorway and to the southeast by Winwick Lane (A579).
- 1.4 The Main Site south of the Chat Moss Line is approximately 198 hectares in size. The majority of the Main Site is comprised of agricultural fields used for arable crops, with some small patches of woodland in the east. The Main Site also includes a number of residential properties, farmsteads, two commercial yards, the Warrington Model Flying Club, the Kenyon Hall Airfield (which is used by the Lancashire Aero Club), and a number of businesses (including Procon Ltd and Golden Orb Solutions (see PEIR Chapter 2 for full description)). Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.. Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.. Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.. Parkside Road (A573) runs through the DCO Site to the south before passing over the M6 where it provides access to Parkside Link Road West.

Purpose of the Outline Construction Environmental Management Plan

- 1.5 This 'Outline Construction Environmental Management Plan' (oCEMP) has been prepared to confirm that appropriate environmental controls will be in place during construction of the Proposed Development.
- 1.6 This oCEMP should be read in conjunction with the 'outline Construction Traffic Management

Plan' (oCTMP). Both the oCEMP and the oCTMP will be further developed once the appointment of the 'Principal Contractor' (PC) for the project has been confirmed and a detailed construction programme has been developed. will be further developed once the appointment of the 'Principal Contractor' (PC) for the project has been confirmed and a detailed construction programme has been developed.

- 1.7 The purpose of this oCEMP is to specify the overarching principles and measures to manage and mitigate the effects of the activities associated with the construction of the Proposed Development. It will also ensure that construction activities cause minimum disruption to people, businesses and the environment. This oCEMP details the environmental controls and procedures that will need to be adopted throughout the development, thereby providing a tool to ensure the successful management of potential adverse effects as a result of the construction activities. It sets out roles and responsibilities for the management of these controls and procedures.
- 1.8 More specifically, the oCEMP aims to:
 - ensure that relevant mitigation measures set out in the Preliminary Environmental Information Report (PEIR) together with any additional mitigation measures in support of the DCO application, are implemented during all construction activities.
 - take into account relevant planning policy.
 - ensure that relevant legislation, Government and industry standards, and construction industry codes of practice and best practice standards are complied with.
- 1.9 The oCEMP provides the information on environmental controls during construction which is available at this time. A oCEMP will be prepared and submitted as part of the DCO, which will include further detail on mitigation measures and will account for feedback from the Statutory Consultation.
- 1.10 Prior to construction of each phase, specific methodologies and procedures will be addressed in detailed phase-specific CEMPs, completed following the appointment of a PC. These will be secured through a DCO requirement.
- 1.11 Alongside the oCEMP, the potential environmental effects of the construction work that have been identified through the environmental impact assessment (EIA) a series of supporting implementation plans set out a clear picture of the measures proposed to protect the environment and local amenity during construction. These implementation plans will be secured through DCO requirements.
 - Construction Traffic Management Plan (CTMP) – which will include measures to ensure that construction traffic will not cause an unacceptable increase in traffic on local roads. The plan will include routing restrictions for construction traffic.
 - Site Waste and Materials Management Plan (SWMMP) – covering the minimisation and management of waste and materials generated and used during construction.
 - Landscape Ecological Management Plan – explaining how landscape and planting and

habitat protection and enhancement will be undertaken with a view to securing specified landscape visual, ecology and biodiversity benefits.

- Habitat Management and Monitoring Plan (HMMP) - to include management targets and methodologies for all habitats to be created to ensure they meet their target biodiversity net gain (BNG) conditions.

CONSTRUCTION METHOD STATEMENTS

1.12 It is anticipated that construction method statements will be required for a number of the construction activities, these are likely to include:

- new rail bridges;
- amendments to existing rail bridges;
- movement of material to the Northern Mitigation Area and Soil Reuse Area; and
- highways works as described in the Highways Mitigation Options Report

1.13 The list of construction method statements will be subject to review and comment through the planning process. For Statutory Consultation, the list of anticipated construction method statements has been provided above, however the final construction method statements will be appended to the oCEMP which will be submitted as part of the DCO.Framework CEMP which will be submitted as part of the DCO.

CONSTRUCTION PROGRAMME AND ACTIVITIES

1.14 The Proposed Development comprises the following main components.

Development of the ILPN SRFI Site

- provision of a logistics park comprising up to c.767,000 square metres (m²) (gross internal area or GIA) of warehousing and ancillary buildings with a total footprint of up to 590,000m² at ground floor level and up to 177,050m² of mezzanine floorspace, comprising a mixture of units with the potential to be rail-connected, rail served and rail accessible units;
- provision of a rail terminal capable of accommodating up to 16 trains (up to 775m in length) per day, including connections to the mainline and ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building, fuelling facilities and staff facilities;
- a rail turn-back facility within the Western Rail Chord capable of accommodating trains up to 775m in length;
- new bridges across the Chat Moss Line to enhance connectivity and replace level

crossings to improve safety;

- closure and diversion of two rail level crossings (Parkside No. 1 and Lowton Moss);
- provision of overnight lorry parking with welfare facilities and HGV fuelling facilities for users of the SRFI;
- new internal roads and works to existing road infrastructure on the Main Site;
- closure of existing access and provision of new access to Newton Park Farm and neighbouring properties;
- new electricity substations;
- new energy centre(s) and potential for battery storage;
- provision of roof-mounted photovoltaic arrays and/or canopy photovoltaic arrays over parking areas capable of providing direct energy supply to buildings on which they are mounted and/or distributing and exporting power via the energy centre(s);
- strategic landscaping and open space, including: bunds up to 3m above the reprofiled ground level, hard and soft landscape works, amenity features and planting;
- earthworks to regrade the Main Site to provide development plateaus, appropriate access, connections to the railway, development plots and landscape zones;
- habitat creation, enhancements, compensation and provision of publicly accessible space;
- an amenity area north of the railway line bounded by rail lines and Parkside Road, providing amenity open space, landscaping and screening as well as heritage interpretation;
- farmland to the north of the Liverpool to Manchester railway and south of the A572 Newton Road for the provision of BNG requirements, new and realigned PRow and landscaping including tree belts to screen views from the north;
- farmland to the east of Winwick Lane for the reuse of topsoil and landscaping including stopping up gaps in hedgerow and tree belts to screen views from the east;
- noise attenuation measures;
- new pedestrian and cycle access routes and connections and infrastructure including provision of new, diversion and stopping up of existing PRow where required (see Table 3.4);
- provision of public transport hub;
- demolition of existing on-site structures (including existing residential dwellings /

farmsteads and commercial premises);

- utility compounds, plant and service infrastructure;
- security and safety provisions inside the ILPN SRFI including fencing and lighting; and
- drainage works including creation of attenuation ponds and sustainable drainage features.

Highway works

- development signage.
- highways mitigation works to be determined through assessment and review with relevant stakeholders, as set out in the Highways Mitigation Options Report (PEIR Appendix 7.2).

Construction programme

1.15 It is anticipated that the general construction programme will broadly be broken down into the following key components:

- construction of new site access on the new Parkside Link Road (PLR).
- realignment of Parkside Road including construction of new site accesses and bridges.
- site preparation, demolition and clearance.
- highway works including additional remote highway works.
- Main Site works:
 - internal highway works.
- earthworks, redistribution of topsoil, creation of development plateaus for logistics buildings.
 - construction of new pedestrian bridges, closure of level crossings, diversion of PRow, creation of new PRow and other accesses.
 - energy centre.
- Rail Terminal.
- Rail infrastructure including new bridges.
- boundary and screen planting, soil re-use area, BNG and landscaping.
- storage and logistics buildings including on-plot landscaping.

- 1.16 The Proposed Development would be constructed in a series of planned phases. Early phases of warehousing (up to 126,000m²) are proposed to be delivered prior to the rail terminal becoming operational. This approach is supported by the NPSNN at paragraph 4.88 where support is given to delivery of warehousing ahead of the final delivery and commissioning of connections to the rail network. This approach protects the Applicant from unforeseen delays with Network Rail connections and works positively for the longer construction period often required for a rail terminal in comparison to logistics buildings.
- 1.17 The indicative but cautious construction programme is shown in Table 1. It is proposed that development would take place in phases with floorspace thresholds or triggers specified for the completion of on and off-site highways works and elements of the Rail Terminal.

Table 1 Proposed phasing of the ILPN SRFI development

Phase	From (year)	Indicative description of works
	Within 12 months of DCO consent	- Discharge of DCO Requirements - Land drawdown - Technical approvals with Local Highway Authorities, Network Rail, National Highways, Environment Agency, Lead Local Flood Authority - Surveys - PC tender process - Ecological mitigation for construction phase, including BNG and tree protection measures - Pre-construction earthworks strategy and PC mobilisation
Construction phases		
1	1 – 2	- Site clearance - Highway and active travel improvements as required - Earthworks - Rail terminal phase 1 and rail connections - Access to Newton Park Farm/adjacent properties - Temporary storage and placement/export of topsoil including Soil Reuse Area - Required utilities diversions and connections - Drainage - Public Right of Way diversions / stopping up - Temporary and Permanent signage - Landscape and planting works - Ecological mitigation for construction phase, including BNG, Northern Mitigation Area and tree protection measures - Development of warehousing with associated parking, yards and on plot landscaping, drainage and roads in Zones A, B and F, including lorry park

Phase	From (year)	Indicative description of works
		• Construction of estate roads, cycleways and footpaths • Energy services (on and off-site)
2	Year 3	• Further utilities works • Highway and active travel improvements as required • Drainage • Signage • Energy services (on and off-site) • The construction of estate roads, cycleways and footpaths • Realignment of Parkside Road • Development of warehousing with associated parking, yards, mobility hub and on plot landscaping, drainage and roads and lorry park with driver amenity provision in Zone F, Zone C and development in Zone G. • Landscape and planting works, ecological mitigation, BNG etc
3	Year 4 – 7	• Further utilities works • Highway and active travel improvements as required • Energy services • Signage • Drainage • Development of warehousing with associated parking, yards and on plot landscaping, drainage and roads in Zone C • The construction of estate roads, cycleways and footpaths • Landscape and planting works, ecological mitigation, BNG etc

Phase	From (year)	Indicative description of works
4	Year 8	• Final phase of rail terminal • Further utilities works • Signage • The construction of estate roads, cycleways and footpaths • Development of warehousing with associated parking, yards and on plot landscaping, drainage and roads in Zone D • Drainage • Landscape and planting works
5	Year 9 – 10	• Further utilities works • The construction of estate roads, cycleways and footpaths • Signage • Development of warehousing with associated parking, yards and on plot landscaping, drainage and roads in Zone E • Earthworks • Drainage • Landscape and planting works

- 1.18 The construction programme will generally commence with establishing access and construction compounds, followed by topsoil stripping, creating plateaus and installing temporary drainage works. Other infrastructure would be constructed after each plateau has been established. There are eight Zones shown on the draft Parameters Plan including the Rail Terminal and Western Rail Chord. The Rail Terminal would have a finished level between c32 – 34m AOD and would lead to a surplus of subsoil, which would be used for fill in part of Zones B and C to the south of the Rail Terminal, which would have a finished floor level of c33.5m AOD. There would be a surplus of subsoil material from Zones C and G, which would be placed in Zone D, to the north of the Rail Terminal and would have a finished floor level of c33.45 - 34m. Zones A and F to the south of Zone C would have a finished floor level of between c33.15 - 33.35m AOD. Zones A, E and F would achieve a cut and fill balance of subsoil within each plot.
- 1.19 There would be a surplus of topsoil of varying grades. Higher quality soil, suitable for best and most versatile agricultural land would be placed, where practicable, on farmland to the immediate east (the Soils Reuse Area), which has been included in the draft Order Limits, or may be used for landscaping or restoration schemes on other development sites in the wider area. Lower quality soils will be used in on site landscaping, screening bunds, the area of land north of the railway identified as a potential amenity area, in creating BNG land to the immediate north (the Northern Mitigation Area), with any remaining to be used in the Soils Reuse Area to the east of the DCO Site. Soils will be tested and segregated into the grade that is suitable for the end use. Soil will be stripped, stored in temporary stockpiles and transported to the appropriate location in accordance with the Site Waste and Materials

Management Plan (SWMMP), to preserve the quality of soil and to minimise its handling, compaction and degradation.

- 1.20 Construction of logistics buildings is likely to commence initially either side of Parkside Link Road in Zones A and B, followed by alongside the Rail Terminal in Zone C, logistics buildings in zones F and G, and finally logistics buildings in the northern part of the site in Zones D and E. The estate road network and other utilities would be extended to serve each Phase of development.

Working hours

- 1.21 At this stage anticipated normal working hours during construction are:
- 07:00 to 19:00 hours Mondays to Saturdays.
 - No routine working Sundays and Bank Holidays.
- 1.22 Normal working hours are subject to the exceptions set out below. If exceptional circumstances occur the relevant local planning authority and appropriate environmental health department will be advised and provided with appropriate method statements and risk assessments.
- 1.23 These hours will be strictly adhered to, unless, or in the event of, the following:
- works are carried out within existing buildings or buildings constructed as part of the authorised development inclusive of power floating floors;
 - works to the highway or railway agreed with the relevant authority;
 - works are carried out with the prior approval of the relevant planning authority;
 - works are associated with slip form working;
 - works involve deliveries, movements to work, maintenance and general preparation works but not including running plant and machinery for a period of one hour either side of the above times;
 - works involve any oversize deliveries or deliveries where daytime working would be excessively disruptive to normal traffic operation;
 - works involve removal / diversion / protection of existing services and installation of new services or drainage;
 - works are associated with an emergency;
 - works involve overnight traffic management measures; and/or
 - works involve completion of an operation that would otherwise cause greater interference with the environment / general public if left unfinished.

- 1.24 The occurrence of exceptional works defined above will be notified to the relevant local planning authority within 72 hours of their commencement, in accordance with sections 61 and 62 of the Control of Pollution Act 1974.

ACCESS AND TRAFFIC MANAGEMENT

- 1.25 In advance of construction activities commencing, routing of construction traffic is outlined in the oCTMP. Following appointment of a PC, detailed traffic management measures will be set out within a phase specific CTMP.
- 1.26 Temporary signage will be used to direct construction traffic to the Main Site along the proposed construction traffic route, as described in the oCTMP, utilising existing street furniture (e.g. lampposts).
- 1.27 All construction traffic will be segregated from pedestrian routes. Pedestrian routes will be kept separate from vehicle traffic and safe routes will be provided through the Main Site as required.
- 1.28 A delivery management system will be used to plan deliveries entering the Main Site. The Site management will manage this system along with its contractors and a delivery schedule provided for the banksman to control.
- 1.29 The type and number of vehicles generated during the construction period will vary according to the different stages of the construction programme, and the type and intensity of work being undertaken. These are detailed within the oCTMP.
- 1.30 HGV movements will also be agreed with the relevant local highway authority (LHA) and included in the detailed oCTMP.

Road Cleaning

- 1.31 Throughout the construction period, a road vacuum sweeper will be deployed on a regular basis to ensure all on-site and affected off-site roads in the immediate vicinity of the Main Site access are kept clean and free from mud and debris.
- 1.32 Road gullies will be inspected on a regular basis to avoid the build-up of silt/detritus and where necessary gullies will be cleaned and connections jetted.
- 1.33 Additional visits will be implemented if the site management team or highway authority note a build-up of debris/deposits on the public highway. A road sweeper will be available on 24-hour call out if required.

Wheel Washing

- 1.34 It is likely, and is also good practice, that the PC will 'stone up' any service road areas which will ultimately form the permanent works. This will enable transient vehicles to traffic only areas comprising crushed stone/concrete.

- 1.35 The PC will ensure and maintain that, as far as is reasonably practicable, no mud/debris is transferred onto the adjoining highway during construction. A pressure wash and brush cleansing will be implemented on-site and supplemented by mechanical road sweepers.

Parking

- 1.36 Parking of adequate size will be provided to accommodate site personnel and visitors as necessary, subject to the measures set out within the oCTMP. No plant or vehicles will be parked on the public highway.
- 1.37 Car parking provision will incorporate adequate charging facilities for electric vehicles (EVs) as determined by the PC for each phase of the construction process. Provision will also be made for covered cycle parking facilities and use of cycling routes to encourage cycling to the Main Site.

SITE STRATEGY

Delivery of Plant and Materials

- 1.38 Loading and unloading will only be permitted in designated areas, as set out in the oCTMP. Sufficient space shall be provided to assist all delivery and construction traffic to be able to turn within the Main Site and leave in a forward gear/direction. Banksman will be used for all reverse manoeuvring operations. No loading/unloading will be permitted on the public highway.
- 1.39 For oversized deliveries or deliveries whereby, daytime working would be excessively disruptive to normal traffic, notification of abnormal loads will be submitted via the Department for Transport website Electronic Service Delivery for Abnormal Loads (ESDAL) system.
- 1.40 To avoid congestion on the local highway network the following measures set out in the oCTMP will be adopted:
- Electronic delivery management schedule used to control the volume of deliveries to the Main Site, this will include the requirement for advance booking.
 - Re-timing deliveries out of the morning peak, where possible, to aid operational efficiency of the construction site and the neighbouring areas.
 - Consolidating deliveries into full loads to reduce the number of delivery vehicles delivering to the Main Site.

Security

- 1.41 Only authorised personnel will be permitted on the Main Site. All visitors will be required to enter through the main site access point and report to the Construction Manager (CM), or designated person. All visitors will be required to sign in and out to ensure that site management are aware of the number of people on the Main Site in the event of an

emergency.

- 1.42 Visitors will be required to undergo induction training, wear the necessary personal protective equipment (PPE), i.e. as a minimum safety helmet, hi-visibility attire, safety footwear and, if necessary, will be accompanied by a representative on the Main Site at all times.
- 1.43 The construction site perimeter will be checked on a regular basis to ensure that it is maintained, in good condition and remains secure. All entrance and exit gates into the Main Site will be secure at all times. More information will be provided by the PC following appointment.
- 1.44 Banksmen will aid construction vehicles in entering and exiting designated set-down areas. All mobile plant/equipment will be parked safely and locked within a designated area to prevent tampering, and keys to all plant/equipment will be kept in a secured location.

Public Rights of Way

- 1.45 As indicated on PEIR Figure 2.1, there are a number of 'public rights of way' (PRoW) crossing the Main Site. Safe access for pedestrians will be maintained, subject to the measures set out in the paragraph below, throughout the construction phases.
- 1.46 Access along retained PRoWs will be protected using Heras fencing, hoardings or similar. Many routes across the Main Site will be closed up or diverted in order to deliver the Proposed Development. Construction works that create dust will be kept to a minimum close to the PRoWs, and dust prevention measures, such as damping, will be undertaken to reduce the impact on users of the PRoW network.
- 1.47 The exact PRoW that will be affected and the measures employed to ensure they can be used safely, or diverted/closed if not practicable, will be detailed in the phase specific CEMPs.

Lighting

- 1.48 While construction phase lighting for the Proposed Development and Remote Highway Works is expected to be short term and reversible it is important to minimise light pollution, and disturbance to the residents, Network Rail and the travelling public on the public highway.
- 1.49 As outlined within Section 35 of The CDM Regulations (2015), the DCO Site must be provided with suitable and sufficient lighting, which must be, so far as is reasonably practicable, by natural light. This relates to both the Main Site as well as the approach and traffic route to the Main Site.
- 1.50 In determining any temporary construction lighting arrangements, due consideration will be given, by the PC, to sensitive receptors that may experience a nuisance by the light, including wildlife. General control measures for the use of lighting are outlined below:
 - Where appropriate, lighting will be activated by motion sensors to prevent unnecessary usage. It will comply with the Institute of Lighting Professionals' Guidance notes for the reduction of obtrusive light.

- Site lighting will be at the minimum luminosity necessary to enable the safety and security of the construction site. Lighting shall be provided to meet the target lux level as set out in BS 12464-2 Lighting of Outdoor Workplaces without over lighting. Luminaires shall be mounted at the lowest practical mounting height, providing lighting where only lighting is required.
- If not practicable to be powered with batteries, or other low noise power source, temporary lighting, when used adjacent to residential areas, must be fixed with a noise screen to keep noise levels to a minimum.
- As far as reasonably practicable, lighting must be directed away from residential properties and sensitive habitats. Lighting that needs to be sited close to the perimeter or ecologically sensitive areas should be fitted with shielding or be switched off or dimmed when not in use.
- Where possible, lighting should be downward facing.
- Lighting should be positioned to prevent glare.
- Lighting will operate in all external areas used by construction workers after dark in order to provide a safe and secure working environment without over lighting. High quality LED light sources with high colour rendering index (CRI) shall be utilised to maximise visibility with efficient light output.
- Lighting should be controlled in such a way to illuminate high activity, hazardous or high security areas while reducing lighting levels at less pertinent areas.
- The PC should act responsibly to adjust any temporary lighting reported as causing a nuisance.
- To improve sustainability, lighting from diesel generators should be avoided.
- If a construction compound is required for more than one year, a more permanent lighting design should be required including columns to avoid overuse of temporary lighting units (which are historically harder to control light spill from than traditional column-mounted lights).
- Lighting should be controlled and on timers to ensure they are only on when needed. Regular checks by a contractor should be undertaken to ensure lights are not left on when not needed.

Construction Manager

- 1.51 An authorised responsible person will be nominated as CM by the PC.
- 1.52 The PC will register the project with the 'Considerate Constructors Scheme' (CCS), which requires that mechanisms are put in place for addressing complaints, monitoring, public liaison, prior notification works, etc.

1.53 The CCS Code of Practice includes:

- *Consideration*: All work to be carried out with the positive consideration to the needs of all potentially affected parties and environment in general.
- *Environment*: Minimising noise and dust from construction, use of local resources where possible, attention to waste management and the implementation of the waste hierarchy (reduce, re-use, recycle) and the avoidance of pollution.
- *Cleanliness*: The working site to be kept clean and in good order at all times.
- *Good Neighbours*: Full and regular consultation with neighbours including adjacent traders and businesses regarding programming and site activities.
- *Respectful*: Respectful and safe standards of dress shall be maintained. Lewd or *derogatory* behaviour will not be tolerated under threat of severe disciplinary action.
- *Safe*: Construction operations and site vehicle movements are to be carried out with great care and with consideration for the safety and security of the general public and site personnel.
- *Responsible*: Considerate Contractors will ensure all site personnel and any other persons working on the Main Site understand and implement the Code.
- *Accountable*: Posters and signs regulating to the project will be displayed adjacent to the Main Site giving names and contact details of staff who can be contacted in response to issues raised by the general public or other persons affected by the site operations.

1.54 Once appointed the CM shall be required to provide a written undertaking as to how the measures in the CCS CoP will be implemented. A copy of this can be provided to the Council upon request.

TRAINING, SITE RULES AND COMMUNICATIONS WITH THE COMMUNITY

Training

- 1.55 Contractual arrangements will require all contractors to provide suitably qualified staff to manage and execute works for which they are responsible. The PC will require that all employees demonstrate an appropriate awareness of local sensitivities, expected code of conduct, working knowledge of the legislation, codes of practice, and guidance relevant to the activities in which they are engaged.
- 1.56 A training regime will be implemented to ensure that all staff members, including sub-contractors, receive focused environmental training to ensure their competence in carrying out their duties on the project.
- 1.57 The PC will be responsible for identifying training needs and will ensure that appropriate training is provided. Training will include information on local considerations and expectations

on site behaviour, 'toolbox talks' for site operatives to maintain an appropriate level of awareness on health, safety and environmental topics and to advise employees of changing circumstances as work progresses. Records of attendance will be kept also for auditing purpose.

Site Induction

- 1.58 The PC will operate a site induction scheme for all personnel to ensure that they are aware of their individual responsibility to comply with the CEMP and phase-specific CEMPs.

Toolbox Talks and Method Statement Briefings

- 1.59 Toolbox talks and method statement briefings will be given as the work proceeds and will cover the environmental controls related to specific activities undertaken during the construction; for example, clearance of vegetation, protecting wildlife, soil stripping and spill response procedures etc. A full attendance register of toolbox talks and method statement briefings will be maintained on the Main Site.

Emergency Procedures and Incident Reports

- 1.60 Procedures will be developed to respond to any emergency incidents which may occur on the DCO Site. In order to ensure that compliance with the requirements of the relevant legislation and to avoid or mitigate against any significant environmental impacts, an 'Emergency Preparedness Plan' (EPP) will be developed by the PC following appointment.
- 1.61 Once the EPP is completed, all staff will be trained and made aware of the EPP. In the event of any incident, the PC's Environmental Health and Safety Team will be notified. Additionally, the BDC and HBBC Environmental Health Department and any other interested bodies will be notified as required.

Training Records

- 1.62 All training records will be maintained and filed on the Main Site. The records will include the content of the courses (induction and toolbox training), record of attendance and schedule of review.

Site Rules

- 1.63 The Site Rules will be developed to include environmental controls wherever applicable. Site rules will be displayed at the Main Site gate and in any on-site offices or welfare facilities. An initial list of site rules to be implemented on the DCO Site is provided below; these will be updated and developed further by the PC following appointment and approved by the local authority as part of each phase-specific CEMP:
- All personnel visiting or working on the DCO Site must complete induction training prior to accessing the DCO Site.
 - All plant/equipment used during the construction activities must be compliant with the Provision and Use of Work Equipment Regulations 1998 (PUWER), maintenance and

relevant certificates must be retained on the DCO Site.

- All substances to be used or handled on site must have the Control of Substances Hazardous to Health (COSHH) assessment available on the DCO Site for staff members to consult.
- At the end of each working day, all means of access, e.g. steps, ladders left in position must be secured/removed to prevent unauthorised persons (especially children) accessing the DCO Site and hazardous areas.
- Smoking will be prohibited on the DCO Site, except in designated areas, and the possession or use of alcohol and drugs is strictly prohibited.
- Site welfare facilities (e.g. portable toilets and canteen facilities) will be maintained for the duration of the demolition and construction activities.
- Standard PPE is required on the DCO Site at all times, as well as additional Protective Equipment as required for specific works.
- All work areas must have clear, well maintained signage.
- All waste materials must be collected and removed from the DCO Site at regular intervals.
- No fires will be permitted on the DCO Site.
- Acts of threat or violence will not be tolerated and any offender will be removed and permanently excluded from the DCO Site.

On Site Communication

- 1.64 A full contact list containing names, job titles and contact numbers of the key site contacts such as the PC's CM and Environmental Health and Safety Team members, shall be produced and maintained.

Community Relations

Statutory Authorities and Interested Parties

- 1.65 The PC, in conjunction with the Applicant, will be responsible for the liaison on environmental matters with statutory and non-statutory authorities and stakeholders. In particular, liaison with nearby residents will be required to avoid conflicts of operations, deliveries, removals and other highways matters.
- 1.66 Where necessary, consultation will be established and maintained with regulatory bodies with regard to environmental aspects of this project.

Local Community Engagement

- 1.67 The PC will provide community relations personnel, who will be the first line of response to

resolve issues of concern or complaints. Reasonable steps will be taken to engage with local residents and businesses prior to and during construction (such as through the use of newsletters and fliers).

- 1.68 Site boards outlining information on the project and forthcoming works will be erected at the entrance to the DCO Site. Site contact numbers will be displayed as appropriate, along with the complaints procedure.

Complaints Management

- 1.69 A formal complaints procedure will be developed; a named CM will be responsible for receiving, recording and responding to external complaints and will have their telephone number displayed for quick response to complaints. Any complaints will be logged, together with a record of the investigation, response and any necessary action taken.

ENVIRONMENTAL CONTROL MEASURES BY TOPIC

- 1.70 The following sections of this oCEMP describe the general mitigation control measures to be implemented throughout the Proposed Development, on a topic-by-topic basis, to ensure the protection of the environment from potential adverse effects from the Proposed Development.
- 1.71 Future phase-specific CEMPs will include detailed mitigation and control measures relevant to each phase, these will be subject to approval by the relevant local planning authority.

Air quality

- 1.72 The mitigation measures outlined in the table below are intended to mitigate fugitive dust emissions during construction.

Table 2 Construction Phase Fugitive Dust Emissions - Embedded Mitigation

Issue	Control Measure
Communications	Develop and implement a stakeholder communications plan that includes community engagement before work commences on the DCO Site Display the name and contact details of person(s) accountable for air quality and dust issues at various locations on the Main Site boundary Display the head or regional office contact information. Develop and implement a Dust Management Plan (DMP), which will include measures to control other emissions, approved by the relevant Local Authorities

Issue	Control Measure
Site Management	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken Make the complaints log available to the relevant Local Authorities when asked Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the log book Hold regular liaison meetings with other high risk construction sites within 250m of the DCO Site boundary, to ensure plans are co-ordinated and particulate matter emissions are minimised
Monitoring	Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results and make the log available to the relevant Local Authorities when asked Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the relevant Local Authorities when requested Increase the frequency of site inspections when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions
Preparing and maintaining the site	Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible Erect solid screens or barriers around dusty activities that are at least as high as any stockpiles on the Main Site Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period Avoid site runoff of water or mud Keep site fencing, barriers and scaffolding clean using wet methods Remove materials that have a potential to produce dust from site as soon as possible Cover, seed or fence stockpiles to prevent wind whipping

Issue	Control Measure
Operating vehicle/machinery and sustainable travel	Ensure all vehicles switch off engines when stationary for more than 1 minute, no idling vehicles Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable Produce a Construction Logistics Plan (see the oCTMP) to manage the sustainable delivery of goods and materials
Operations	Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques Ensure an adequate water supply on the DCO Site for effective dust suppression, using non-potable water where possible and appropriate Use enclosed chutes and conveyors and covered skips where present Minimise drop heights and use fine water sprays where appropriate Ensure equipment is available to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods, where appropriate
Waste management	Bonfires and burning of waste materials to be prohibited
Demolition	Ensure water suppression is available during demolition operations Avoid explosive blasting, using appropriate manual or mechanical alternatives Bag and remove any biological debris or damp down such material before demolition
Earthworks	Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable Only remove the cover in small areas during work and not all at once

Issue	Control Measure
Construction	Avoid scabbling (roughening of concrete surfaces) if possible Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust
Trackout	Use water-assisted dust sweepers on the access and local roads, to remove, as necessary, any material tracked out of the DCO Site Avoid dry sweeping of large areas Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable Record all inspections of haul routes and any subsequent action in a site log book Install hard surfaced haul routes where appropriate, which are regularly dampened down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned Implement a wheel washing system Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the Main Site exit Access gates to be located at least 10m from receptors

Noise and vibration

1.73 Measures included in the oCEMP to mitigate construction phase noise and vibration impacts comprise the following:

- Phasing of earthworks to prioritise the construction of any bunding to provide screening of the subsequent works where practicable.
- Selection of appropriate equipment and construction methods, e.g., hydraulic plant will

be used in preference to pneumatic plant, and electrically powered rather than internal combustion engine powered, where practical and feasible.

- Plant and equipment will be maintained in good working order and fitted with silencers and acoustic panels where appropriate.
- All plant will be switched off when not in use or throttled down between periods of use.
- Acoustic enclosures and temporary hoardings/screens around works will be used where required.
- Noisy works will take place during agreed site hours, and there will be appropriate management of working hours for noisier tasks.
- 'White noise' type reversing warnings should be used on mobile plant in preference to 'bleepers' to minimise intrusion.
- Site personnel will be instructed on Best Practice Means to reduce noise and vibration as part of their site induction training and as required prior to specific work activities.
- Liaison with nearby residents in advance of works commencing and on an ongoing basis to provide information regarding the programme.
- Construction related plant to be located as far as reasonably practicable from noise-sensitive receptors.
- A noise and vibration monitoring regime may be implemented, focusing on the nearest/most exposed receptors and including trigger levels to ensure significant levels of noise and vibration are avoided.

Landscape and visual effects

1.74 Measures included in the oCEMP to mitigate construction phase landscape and visual impact comprise the following:

- Keeping a tidy and organised site.
- Materials delivered on an 'as needed' basis to prevent unnecessary stockpiles.
- Protection of retained vegetation in accordance with British Standard (BS) 5837:2012. Hedgerow and trees located in proximity to the working areas will be protected from disruption and if necessary, protection fences will be erected to ensure that roots remain undisturbed.

Ecology and biodiversity

1.75 An Ecological Clerk of Works (ECoW) will be appointed to act as a point of contact for any ecological issues that may arise during construction. The ECoW will be a suitably experienced and qualified ecologist. The ECoW would be available to provide advice that may be carried out by construction personnel, as determined by the ECoW on a case-by-case basis. Certain

activities may require the ECoW to attend the construction site to undertake surveys or provide supervision and advice when required.

1.76 The ECoW would provide construction personnel information in the form of a toolbox talk prior to commencement of any activity that may impact upon Important Ecological Features (IEFs) as determined by the ECoW or specified within the oCEMP.

1.77 Measures included in the oCEMP to mitigate construction phase ecology impact comprise the following:

- Biodiversity Protection Zones (BPZ) following the Root Protection Zones (RPZ) around retained hedgerows, woodland and individual trees.
- Where possible vegetation clearance will avoid the breeding bird season (March-August inclusive). Where the breeding bird season cannot be avoided clearance would be commenced only after a nesting bird check undertaken by the ECoW (or a suitably experienced ecologist). Following the nesting bird check a BPZ will be provided around any identified active bird nest within vegetation, on the ground, or within buildings which are to be cleared for construction. An appropriate BPZ/s would be determined by a suitably experienced ecologist or the appointed ECoW to ensure the protection of the feature until it is no longer active.
- Implementation of a strategy to avoid harm to common lizard and reptile species (to be detailed fully within the oCEMP).
- Appropriate BPZs would be provided around any identified bat roosts (within trees or buildings) to protect the feature from disturbance during construction. Bats roosts to be lost will be closed following methods agreed upon within a Natural England European Protected Species Mitigation Licence (EPSML).
- Provision of a sensitive lighting scheme for bats.
- Precautionary measures will be developed for the protection of common and widespread amphibians such as common toad. Great crested newts (GCN) are to be compensated for with a Natural England District Level Licence (DLL). However, the precautionary methods employed would also look to protect individual GCN from construction impacts. Should any individual amphibians be encountered measures within the oCEMP will detail how they are to be safely handled and provide locations for receptor areas with suitable habitat (outside of the construction area) where these individuals can be moved to.
- Appropriate BPZs would be provided around any specimens of Maiden Pink identified for translocation in order to protect the individual plants prior to being translocated.
- Best practice working methods to be implemented for the stockpiling and storage of excavated material including; appropriate distances of storage from sensitive Important Ecological Features (IEFs) such as the adjacent SSSI; and measures to prevent the dispersal of material from wind or rain. Measures might include covering or capping stockpiles or damping down material, providing secondary containment or use of

barriers such as silt fencing (as appropriate).

- Best practice working methods to reduce the risk of environmental releases of stored chemicals, fuels and materials that might impact upon IEFs. This will include locating storage areas away from identified IEFs, use of secondary containment methods, and where possible storage of chemicals or fuels off-site.
- Measures to ensure against the entrapment of wildlife (particularly badgers and other small mammals) within excavations or open pipework.
- Appropriate timing of works to reduce or avoid impacts to seasonally present wildlife.
- Precautionary working methods including fingertip searches and supervised clearances (where required).

1.78 An Invasive Non-Native Species (INNS) Management Plan will be developed, as part of the oCEMP, which would provide measures to ensure that no spread of INNS occurs within the Proposed Development or to areas outside the draft Order Limits. Measures would include (but may not be limited to) the following: Framework CEMP, which would provide measures to ensure that no spread of INNS occurs within the Proposed Development or to areas outside the draft Order Limits. Measures would include (but may not be limited to) the following:

- Clear and accurate plans showing the location of INNS within the construction area.
- Provision of BPZs around areas of INNS to prevent disturbance during construction.
- Information to be provided to construction personnel through toolbox talks and appropriate signage on fencing around BPZs for INNS.
- Measures to remove, or treat INNS, with the aim to eradicate these species from the Main Site and Western Rail Chord.
- Measures to prevent the spread of INNS through transfer either within the construction area or draft Order Limits or to areas off-site outside the Draft Order Limits, should personnel come into contact with INNS or INNS contaminated soils/materials. Including the location of wash down areas and instructions for cleaning clothing, equipment and plant.

1.79 Prior to construction an updated badger survey will be undertaken for the Main Site and Western Rail Chord. A derogation licence from National England will be applied for to allow for the closure of setts within 30m of construction activities. The following mitigation measures will prevent injury or harm to badgers:

- All site personnel should be informed about the potential presence of badgers within the construction area and briefed on procedures to follow if they come across a badger whilst working.
- Where possible works will be restricted to daylight hours to prevent road collisions with machinery at nighttime.

- Any excavations or trenches left overnight must be covered or have an escape route such as a shallow gradient at one or both ends or a substantial plank of wood. Inspections must occur each morning and evening to ensure that no badgers have become trapped.
- Open pipework with a diameter of more than 120mm should be checked, then fully covered, or capped at the end of the working day to prevent badgers from entering and becoming trapped.
- The storage of topsoil or other “soft” building materials within the Site should be given careful consideration. Badgers will readily adopt such mounds and create setts which would then be afforded the same legal protection as established setts. To avoid the adoption of such mounds, they should be subject to daily inspections before work commences or alternative measures put in place, such as being fenced off.
- Litter, tools and potentially dangerous materials onsite should be cleared at the end of the working day. Care should be taken that there are no sharp metal objects or pointed protrusions on the ground which could seriously injure a badger due to their poor eyesight.
- The storage of any chemicals should be contained in such a way that they cannot be accessed or knocked over by any roaming badgers.
- Care must still be taken that badgers are not disturbed by noise, vibrations or light caused by works, which can have a large area affect.

Cultural heritage

- 1.80 The Huskisson Memorial Grade II listed asset and Parkside Road Bridge (non-designated heritage asset) are to be retained within the draft Order Limits. The Huskisson Memorial (Grade II) will also be subject to protection and monitoring of its structural integrity during construction activity; and it is anticipated that the use of a phased approach to the construction activity would have the incidental effect of reducing the intensity of the construction effects across the DCO Site as a whole and minimising the length of time that certain heritage assets may be affected.
- 1.81 Where heritage assets within the DCO Site will be retained as part of Proposed Development, provision for protection (through the use of hoardings and protective coverings) and monitoring of these assets (through the use of periodical visual and photographic appraisals of the asset as part of the environmental monitoring programme) will be proposed through the oCEMP.

Archaeology

- 1.82 The phase specific CEMPs will include an Archaeological Mitigation Strategy (AMS), which will be secured by a DCO Requirement, and which sets out the objectives for the archaeological mitigation and the mechanisms for the appointed archaeological contractors to design and programme the fieldwork, undertake evaluation, mitigation, analysis, reporting and archiving. The AMS will be provided for the pre-construction archaeological investigation phase.

- 1.83 To inform the nature and the extent of the required mitigations, a proportionate and targeted archaeological evaluation will be considered where appropriate, in consultation with the Archaeological Advisors to the LPAs and Historic England to advise on buried heritage constraints and mitigation on specific areas. It is expected that this will target some of the areas of known archaeological potential identified by the geophysical survey and Desk Based Assessment, which have not been yet evaluated, when likely significant effects are expected on those areas.
- 1.84 If needed, additional mitigation measures can be considered to mitigate temporary, indirect effects, such a localised use of gravel and track matts to distribute the weight of heavy machinery, will offset any impact arising from ground loading.

Surface water and flood risk

- 1.85 The phase specific CEMPs will manage and mitigate impacts from the Proposed Development on surface water and flood risk during the construction phase. Measures may include:
- locating the site compound, welfare facilities and storage of materials outside of the floodplain.
 - working safely in proximity to watercourses.
 - recommending employers sign up for EA Flood Warnings and Flood Alerts.
 - monitoring local weather warnings for heavy rainfall.
 - designated pathways for large vehicles to limit areas of sediment compaction.
 - the implementation of temporary surface water conveyance routes and temporary attenuated storage measures which will ensure surface water runoff is intercepted, safely stored and discharged from the DCO Site at a rate no greater than existing.
 - the provision of appropriate measures to provide treatment to runoff prior to discharge from the DCO Site through the surface water management plan.
 - monitoring the water quality of surface water flows leaving the DCO Site.
 - provision of welfare facilities including the proper disposal of foul water.
 - covering the surfaces of stockpiles or large areas of bare ground, or treating such as through hydroseeding, to reduce sediment mobilisation.
 - undertaking wheel washing facilities and regular sweeping, to reduce sediment build-up.
 - dust management.
 - appropriate management of waste water from wheel and lorry washing facilities and concrete production, if mixed on-site.

- regular inspection and maintenance of vehicles used on-site.
- a designated bunded impermeable area for on-site refuelling.
- locating oil and fuel storage in appropriate above ground storage tanks, with facilities to include drip trays for use under vehicles to prevent contaminated runoff.

Geology, soils and contaminated land

- 1.86 The Principal Contractor is required to produce phase specific CEMPs which will detail mitigation measures to control the risks to surface water receptors and the health of construction workers during each construction phase. It will be a requirement of the DCO that the phase-specific CEMPs are submitted to and approved by the Local Planning Authorities prior the commencement of each phase of development.
- 1.87 Good practice such as CIRIA C811 Environmental Good Practice on Site Guide and CIRIA C670 Site Health Handbook during construction works will be implemented. Adequate standard PPE and the development of basic hygiene measures will be implemented. Measures will be undertaken to minimise the potential for the movement of sediments into surface watercourses, which may include seeding stockpiles, silt traps and temporary drainage grips.
- 1.88 Spillages (such as oil, fuel, cement, chemicals etc.) and soil erosion or the generation of suspended solids during construction activities will be controlled through standard practice construction measures. Designated fuelling areas for plant would be set up with suitable double bunding for tanks, spill kits available and an emergency plan in place for dealing with any spills.

Materials and waste

- 1.89 The following measures are to be implemented through this oCEMP in relation to materials and waste:
- methods for the prevention and control of any potential short-term construction phase impacts (e.g., construction dust, and the risk of accidental spillages of contaminating materials) and also permanent impacts (e.g., disturbance to vegetation, archaeology and heritage).
 - good materials management methods, such as location of temporary haul routes and re-use of temporary works materials from haul routes, plant and piling mats etc.
 - risk/impact-specific method statements (to be included as appendices to the oCEMP) and strategic details of how relevant environmental impacts would be addressed throughout the Proposed Development.

Energy and climate change

Greenhouse gas ('carbon') emissions

- 1.90 There is also a requirement to manage carbon through construction in line with

PAS2080:2023¹, including carrying out whole-life carbon assessment prior to construction and for the as-built development. In fulfilment of the requirements, responsibilities for carbon management, targets for reduction, and specific construction-stage measures to achieve those targets are expected to be set out in detail prior to works commencing.

1.91 The following measures general measures are proposed at this stage to mitigate potential construction phase impacts on energy use and climate change:

- where practicable, pre-fabricated elements should be delivered to the DCO Site ready for assembly, which will reduce on-site construction waste and reduce vehicle movements as part of the construction process.
- construction materials should be sourced locally where possible, to minimise the impact of transportation.
- vehicles used in road deliveries of materials, equipment and waste arisings on- and off-site should be loaded to full capacity to minimise the number of journeys associated with the transport of these items.
- all machinery and plant should be procured to adhere with emissions standards prevailing at the time and should be maintained in good repair to remain fuel efficient.
- when not in use, vehicles and plant machinery involved in site operations should be switched off to further reduce fuel consumption.
- where possible, local waste management facilities should be used to dispose of all waste arisings, to reduce distance travelled and associated emissions.
- the volume of waste generated should be minimised, and resource efficiency maximised, by applying the principles of the waste hierarchy throughout the construction period including use of segregated waste storage to maximise recycling potential for materials.
- where possible, welfare cabins, site lighting and similar equipment which incorporates on-site renewable energy supply should be procured; typically units with PV panels and where applicable battery storage are commercially available.
- where practicable, hiring/purchasing alternative fuel/electric construction plant; at the time of writing, fully electric, hybrid or hydrogen-adapted (fuel cell or hydrogen reciprocating engine power packs) plant is starting to become available as demonstrators or (for smaller plant items) available on the market from the major manufacturers and such plant may become more widely available at the time of construction work from 2030 onwards.

Climate risks

¹ BSI (2023): Carbon Management in Infrastructure and Built Environment, <https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-2080-carbon-management-in-infrastructure-and-built-environment/>, accessed 25/07/25

1.92 The following good-practice measures for construction workers' welfare, drawn from HSE guidance², will be incorporated into the working practices:

Cold environments

- Ensure the personal protective equipment issued is appropriate
- Provide mobile facilities for warming up, and soup or hot drinks
- Introduce more frequent rest breaks
- Consider delaying the work until warmer times of the year without compromising on safety
- Make sure workers can recognise the early symptoms of cold stress, such as a cough or body aches

Hot environments

- Reschedule work to cooler times of the day where needed
- Provide more frequent rest breaks and introduce shading to rest areas
- Provide free access to cool drinking water
- Introduce shading in areas where people are working
- Encourage workers to remove personal protective equipment when resting to help encourage heat loss
- Make sure workers can recognise the early symptoms of heat stress

MATERIAL AND RESOURCE USE AND WASTE MANAGEMENT

1.93 In line with the Government's 25 Year Environment Plan, the "Net Zero Strategy: Build Back Greener" report includes commitments to eliminate all avoidable waste (including plastic) and only permit landfill where no other treatment is possible. The SWMMP aligns with these objectives, with the principle objective of the plan to use material resources more efficiently and seek to reduce the volume of waste produced and the volume of waste requiring final disposal by landfill. This will be secured through a Requirement of the DCO.

1.94 The SWMMP sets the following waste-related targets for ILPN SRFI:

- At least 90% (by weight) of all non-hazardous Construction and Demolition Waste will be subjected to material recovery in accordance with the Waste Framework Directive.

² HSE, undated: Outdoor Working. <https://www.hse.gov.uk/temperature/employer/outdoor-working.htm>

- The Main Site will aim to achieve a cut and fill balance for excavated sub-soil material.
- Surplus topsoil will be managed sustainably as a finite resource to retain its value.

1.95 The SWMMP will be reviewed and amended as appropriate by the PC once appointed. This sets out the way waste resources will be managed during the site preparation and construction works. Construction stage updates to the plan should include the following:

- Actions to meet the waste hierarchy in accordance with the principles of the Government's "Waste Strategy 2000", and the Site Waste Management Plans Regulations 2008 (since repealed). A principal aim during construction will be to reduce the amount of waste generated and exported from the DCO Site, whereby the intention is first to minimise, then to treat at source and, finally, only when all other options are discounted, to dispose of off-site as necessary.
- Consideration of opportunities to maximise material reuse and introduce the standardisation of selected materials to ensure waste inherent in the design is further reduced through detailed design, including the site accommodation within the main construction compounds and temporary works.
- Assignment of the person within the PC's organisation with responsibility for the SWMMP. The PC will audit waste carriers and disposal facilities and maintain documentary evidence that these requirements are being met. A register of waste carriers, disposal sites (including transfer stations) and relevant licensing details will be established and maintained.
- procedures for waste will be sorted into different waste types such as cardboard, timber, metal, plastic for return to the suppliers or disposed of into skips for removal by a licenced waste carrier.
- any hazardous materials including solvents and chemicals, will be properly sealed in containers at the end of each day, prior to storage in appropriately protected and bunded storage areas.

1.96 The 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'³ will be followed, which sets out management measures for topsoil and subsoil.

AUDITING AND REVIEW

Environmental Monitoring Programme

1.97 A schedule of monitoring of environmental performance and formal compliance auditing of the CEMP (and subsequent phase-specific CEMPs) will be conducted and is outlined here. This will enable the overall effectiveness of the environmental mitigation measures and

³ Defra (2009): Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, available at: <https://assets.publishing.service.gov.uk/media/5b2264ff40f0b634cfb50650/pb13298-code-of-practice-090910.pdf>, accessed 14/08/25

compliance procedures to be assessed and allow any areas of underperformance to be identified so corrective actions can be taken. The monitoring programme proposed under this oCEMP includes both proactive scheduled daily inspections and reactive event based inspections.

Daily Inspections

- 1.98 Routine daily visual inspections will be carried out on all activities and work areas in order to check compliance with this oCEMP and regulatory conditions. The inspection process and criteria will be specified in the phase-specific CEMPs. The results of these inspections will be recorded and reviewed by the CM weekly, using a 'Weekly Site Environmental Form' (WSEF).
- 1.99 Separately, event-based checks shall be conducted by the PC following any significant event such as rainfall of sufficient quantity to generate significant run off, high winds, the receipt of an environmental complaint, any spillage or pollution incident, encroachment on an Biodiversity Protection Zone or other evidence of impact on a protected species of habitat, issue of a non-compliance report or any exceedance in monitoring results.
- 1.100 Event based checks should be record on a separate inspection form detailing the reasons, observations, findings and outcomes (including corrective and preventative actions) of the inspection which should then be attached to the WSEF.

Incident Reporting, Corrective and Preventative Actions

- 1.101 All incidents including actual or potential (near miss) for injury, or damage to equipment, property or the environment will be reported to the appropriate regulatory body as soon as practicable after the occurrence.
- 1.102 Regardless of how minor the incident appears, it will be reported. An 'Incident Investigation Report' will be completed within 18-hours of the event. Prompt reporting will allow an immediate investigation to take place and prevent similar situations occurring.
- 1.103 Reporting hazards is the responsibility of all staff and if a hazard or a safety problem is identified, it will be brought to the attention of the CM who will investigate and rectify the situation as soon as practicable.

CEMP Review

- 1.104 The PC will further develop the controls outlined in this oCEMP (and subsequent phase specific CEMPs) and ensure they are properly implemented and regularly monitored to ensure their effectiveness.
- 1.105 Changes to the controls will be instigated if they are not achieving their objectives. The phase-specific CEMP's will be revised and refined, as required, to ensure it remains consistent with environmental regulatory requirements and requirements of the DCO.