

Former RAF Wethersfield – Condition 13 Construction and Environmental Management Plan

MHCLG clarifications (11 February 2025)

The clarifications sought within this document from the Home Office are to assist MHCLG in their determination of condition 13. This document will therefore form part of MHCLG's formal decision and be published within the public record.

	Topic	Clarification Sought	HO Response
1	Ensuring the Safety of resident SUs	<p>Para. 3.1 states <i>“Prior to service users being permitted on site the Home Office will conduct the required walk over surveys and submit the relevant documentation inclusive of any applicable remedial steps to the Ministry of Housing, Communities and Local Government (MHCLG) as per condition 13 of the Wethersfield SDO.”</i></p> <p>Clarification: please clarify if the walk over surveys for UXOs have been conducted (Yes/No)?</p> <p>Para. 3.1 also states <i>“Prior to breaking ground any significant contamination risks have and will continue to be identified, and appropriate integral mitigation measures will be implemented.”</i></p> <p>Clarification: please clarify if para. 3.1 is in regard to UXO (as sub-heading) or contamination risks generally?</p>	<p>Yes</p> <p>Both</p>
2	Traffic Management	<p>Para. 3.3 confirms that <i>“Construction and servicing vehicles will use the Main Gate and Gate 7. Should there be blockages at these gates then alternate entrances will be used during the construction phase....”</i></p> <p>Annex C, para. 3.5 identifies Gate 10 for Reserve/Emergency access.</p> <p>Clarification: please confirm that only Gate 10 will be used for an alternate entrance if the Main Gate and Gate 7 are not accessible (Yes/No).</p>	Yes
	Engagement	<p>Para. 3.4 states <i>“The Home Office Facilities Management Team have provided and exchanged direct contact details with various residents and representatives of the local community, e.g. the private residential properties on Sculpins Lane, and have regular dialogue, including ad-hoc face-to-face meetings, to discuss and respond to issues of concern to residents/the local community.”</i></p>	

		<p>Clarification: does the role of and communication by the HO Facilities Management Team include keeping adjoining owners or occupiers about construction work (Yes/No)?</p>	<p>Communication on construction is managed by the onsite HO Operations Management team, however the Facilities Management team continues to liaise on direct complaints.</p>
3	Contamination	<p>Para. 3.6 confirms that “...<i>absence of any such contamination [radiological] at depth cannot be guaranteed. Recommend that monitoring is performed during any intrusive ground works...</i>”</p> <p><i>“As identified within Section 3.1 a UXO specialist will be available for any excavation and appropriate testing and analysis will be undertaken to correctly classify and dispose of potentially contaminated soils.”</i></p> <p>Clarification: will a suitably qualified contamination expert oversee ground works (Yes/No)?</p> <p>And undertake/arrange for appropriate testing and analysis of potentially contaminated soils (Yes/No)?</p>	<p>Yes</p> <p>Yes</p>
4	Lighting	<p>Para. 3.8 (and para. 3.23 of Annex C) states “<i>To ensure existing wildlife corridors around and within the Site are maintained any new lighting required in the vicinity of the modular units and existing buildings will be well designed to an appropriate specification and direction so as not to impact the surrounding environment. This will also include all adjoining owners and occupiers which will be affected.</i>”</p> <p>Further Information: please provide further information on the “<i>appropriate specification</i>” in the context of applying best practicable means to minimise the adverse effects of lighting during construction to address Condition 13 (c)(ii). For example, will construction related lighting ensure there is no spill beyond the boundary and only be kept operational from sunrise/early morning to nightfall?</p>	<p>Yes – construction related-lighting will ensure there is no spill beyond the boundary and only be kept operational from sunrise/early morning to nightfall. Other measures include use of warm downward-facing lighting, with asymmetric beams which helps to reduce any potential glare. The range of lux of lighting will be kept to the minimum necessary and this has been measured to a maximum 280 lux directly under the lights, to a maximum of 22 lux where the light is directed</p>

			(e.g. the road). This is the lowest light level needed to ensure adequate visibility and for site security. The Home Office will always need to ensure that areas are adequately lit to prevent harm to users, under the Health and Safety at Work etc Act 1974.
5	Waste Management	<p>Para. 4.1 states <i>“Where appropriate, waste streams are separated at site into separate collection receptacles. Refer to Schedule II – Site Constraints Layout Plans.”</i></p> <p>Clarification: please confirm the acronyms listed on the ‘Waste and Storage Material Layout Plan (i.e. TS&B, EPPH, PCC and Ebrit).</p>	<p>TS&B = Company Name</p> <p>EPPH = Company Name</p> <p>PCC = Company Name</p> <p>Ebrit = Company Name</p>
6	Storage of Materials	<p>The ‘Waste and Storage Material Layout Plan’ shows areas where ‘Materials’ will be stored.</p> <p>Clarification: please confirm if this will be general construction materials (Yes/No)?</p> <p>And the policy, procedure or standard for the storage of this material. For example, will this be covered/secured to prevent access?</p>	<p>Yes</p> <p>Yes – All materials for use by the sub-contractors are stored and secured by locks.</p>
7	Sourcing of Materials	<p>Condition 13 (d) requires a policy, procedure or standard for the sourcing of construction materials.</p> <p>Annex R is Kier’s policy for responsible procurement but this annex is not referenced in the CEMP so there is no clear development specific commitment to it.</p> <p>Clarification: Please clarify if Kier will implement this policy to address Condition 13 (d) (Yes/No)?</p>	<p>Yes</p>
8	Noise	<p>Para. 4.5 confirms <i>“In accordance with The Control of Noise at Work Regulations 2005, construction will be limited to 85 Decibels, however this could be exceeded for very short periods of times.”</i></p>	<p>Typically a period of less than 10 minutes i.e., drilling (and where appropriate will use</p>

		Clarification: please clarify “ <i>very short periods of times.</i> ” It may be appropriate to provide examples.	baffle boards to mitigate noise levels)
9	Invasive Species	<p>Annex V identified management procedures for the invasive (terrestrial) plants of Giant Hogweed, Japanese Knotweed and Himalayan Balsam.</p> <p>Annex E, para. 2.98, confirms there are recent records of two species of Invasive and Non-native Plant species within the study area; Himalayan Balsam and Japanese Rose.</p> <p>Further Information: please provide a policy, procedure or standard to manage Japanese Rose to address the requirements of Condition 13 (i).</p>	<p>As per Annex E para 2.99 which confirms there is “<i>no field evidence for Himalayan Balsam or Japanese Rose was recorded on site</i>”. Annex E Para 2.98 notes that the records indicate “<i>Japanese Rose was 1.6km southwest of the site</i>” (i.e. not on the site).</p> <p>If evidence was found that Japanese Rose or Himalayan Balsam was on the site, the following regulations would apply:</p> <ul style="list-style-type: none"> - UK Wildlife & Countryside Act, - The Invasive Species (Enforcement & Permitting) Order 2019 and - EU Regulation (1143/2014) on the prevention and management of the introduction and spread of invasive alien species <p>Re Condition 13(i) covered in the bullets in Annex V e.g. <i>“Ensure wheels / tracks of plant</i></p>

			<p><i>and machinery working in areas contaminated by invasive plants are cleaned on exit (containing any debris / run-off)”</i></p> <p>Wheel washing stations are in place at all exits for this purpose</p>
10	Appointment and retention of suitable professionals	<p>Para. 4.11 states <i>“We will make arrangements for the appointment and retention of a suitably qualified archaeologist, arboriculturist, ecologist, ordnance specialist or contamination expert...”</i></p> <p>Further Information: please confirm the policy, procedure or standard of arrangements for the appointment and retention of these professionals to address Condition 13 (m).</p>	<p>In line with the Crown Commercial Services framework, we would work with our contractor and consultant team to ensure specialists are available via existing contractual arrangements. The Home Office would create a statement of works, and a purchase order in line with HO procurement procedures.</p>
11	Awareness Training	<p>Para 4.11 states <i>“We will make provision of awareness training to contractors in relation to contamination, unexploded ordnance and other risks that may be associated with construction work.”</i></p> <p>Further Information: please confirm the policy, procedure or standard to provide awareness training to contractors in relation to contamination, UXO and other risks. For example, as part of their site induction, will contractors receive awareness training from suitable professionals?</p>	<p>This is highlighted in the site induction, Annex Y, provided by Kier which is SMSTS (Site Manager Safety Training Scheme) compliant</p>

12	Resident SU Safety	<p>Para. 6 states <i>“All areas of construction (except emergency works) will be inaccessible to resident service users, however during their induction (Annex Y – Site Induction) upon arrival on site they will be made aware of any construction and any applicable safety measures they will be required to follow”</i></p> <p>Clarification: please clarify if Annex Y relates to Kier workers and their subcontractors only and is not an induction policy, procedure or standard for resident SUs (Yes/No)?</p> <p>If Yes, please provide the induction policy, procedure or standard for SUs.</p>	<p>Yes</p> <p>The induction policy and procedures for SUs have been provided with the OMP under the requirements of Conditions 19/20 and are published as approved documents on Special Development Order: Former RAF Airfield Wethersfield, Braintree, Essex, CM7 4AZ - GOV.UK (Annex II and Annex RR)</p>
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