



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks
and adjoining land, Bedford

Construction Environmental Management Plan –
Demolition of Vine Cottages

Revision Number: 01

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ACRONYMS

Term	Definition
ACM	Asbestos Containing Material
AIL	Abnormal Indivisible Load
ArbCoW	Arboricultural Clerk of Works
BPM	Best Practicable Means
CEMP	Construction Environmental Management Plan
CEZ	Construction Exclusion Zone
CLP	Construction Logistics Provider
CLO	Community Liaison Officer
CLOCS	Construction Logistics and Community Safety
COSHH	Control of Substances Hazardous to Health
CTMG	Construction Traffic Management Group
CTMP	Construction Traffic Management Plan
DMS	Delivery Management System
EA	Environment Agency
ECoW	Ecological Clerk of Works
EnvCoW	Environmental Clerk of Works
EPSML	European Protected Species Mitigation Licence
GDTE	Groundwater Dependent Terrestrial Ecosystems
GHG	Greenhouse Gas(es)
HDV	Heavy Duty Vehicle
HSE	Health, Safety and Environment
IAQM	Institute of Air Quality Management
IBC	Intermediate Bulk Container
LGV	Light Goods Vehicle
LHA	Lorry Holding Area

MHCLG	Ministry of Housing, Communities and Local Government
MCERTS	Monitoring Certification Scheme
OSC	Operational Support Centre
OS	Ordnance Survey
PAS	Publicly Available Specification
PPE	Personal Protective Equipment
PPG	Pollution Prevention Guidance
RAMS	Risk Assessment and Method Statement
RPA	Root Protection Area
SDO	Special Development Order
SMP	Soils Management Plan
SOP	Standard Operating Procedure
SPI	Species of Principal Importance
SQE	Suitably Qualified Ecologist
SuDS	Sustainable Drainage Systems
TC	Transport Coordinator
UKAS	United Kingdom Accreditation Service
UXO	Unexploded Ordnance
WJ	Wilson James Ltd
WTN	Waste Transfer Note

DEFINITIONS

Term	Definition
Construction Environmental Management Plan (CEMP)	A site-specific document outlining how a developer will manage and mitigate environmental impacts during construction.
CEMP Works	The scope of works covered by this CEMP.
CEMP Land	The boundary of the part of the Order land on which the construction work to which the CEMP relates.
CEMP Staff	Construction workers and other staff involved in the CEMP Works.
CEMP Period	The period in which the CEMP Works will be delivered. For the CEMP Works these are June 2026 (subject to approvals) to end 2026.
Contractor	The Contractor carrying out the CEMP Works.
Authorised Development	The development for which planning permission is granted under article 4 (grant of planning permission) of the SDO.
Order land	Means the land to which the Special Development Order applies, as described in article 1(4) (citation, commencement, extent, application, and revocation) of the SDO.
Site Controller	Means the undertaking designated as such from time to time under condition 3 (designation of site controller and appointment of principal representative) of the SDO.
The Promoter	UDX Development Company Limited.

UNITS

Term	Definition
dB	Decibel
dB L _{Aeq}	A-weighted equivalent continuous sound level, in decibels
m	Metre
mm/s	Millimetres per second
PPV mm/s	Peak Particle Velocity, in millimetres per second
ug/m ³	Micrograms per cubic metre

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
Background, Context and Description of Site	X				
A. General Management Processes	X				
B. Construction Working Hours	X				
C. Engagement with the Neighbouring Residents	X				
D. Noise and Vibration		X			A standalone Noise and Vibration Assessment is not considered proportionate for the CEMP Works because the demolition activities are of short duration (anticipated 2–3 weeks) and limited scale. Proportionate controls are nevertheless included in Section D, including prescribed limits,

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
					compliance monitoring, trigger / action levels and Best Practicable Means.
E. Control of Dust and other Emissions to Air		X			A more detailed dust and air emissions management regime is not considered proportionate for the CEMP Works because the activities are of short duration and do not include operations typically associated with elevated dust risk (such as crushing, grit blasting or extensive material processing). Proportionate controls and an exceedance response are included within Section E.
F. Material Storage Management (Method Statement)		X			A standalone Materials Management Plan is not considered proportionate for the CEMP Works because the

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
					demolition arisings and stored materials can be appropriately managed through the controls set out in Sections F, I and N without a separate appendix or management plan.
G. Soils Management			X		A standalone Soils Management Plan is not required because the CEMP Works are demolition works with only limited incidental excavation and the anticipated volume of excavated material is less than 100m ³ . Any excavated material will be managed through Section F and removed / disposed of in accordance with Section I.
H. Arrangements for Site Welfare, Fencing and Construction Equipment and Plant	X				

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
I. Construction Waste Management		X			A standalone Construction Waste Management Plan is not considered proportionate for the CEMP Works because the demolition arisings and waste streams can be appropriately managed through the controls set out in Section I and associated site controls without a separate appendix or plan.
J. Construction Lighting Management (Procedure)			X		This section is not relevant because all CEMP Works will be undertaken during normal working hours and no night works are anticipated. If this changes, the CEMP will be updated under document control before any such works commence.

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
K. Strategy for Piling Operations and Associated Risk Assessment (Method Statement)			X		This section is not relevant because no piling activities form part of the CEMP Works.
L. Management of Surface Water		X			Section L is relevant because temporary runoff, dewatering, wheel-cleaning water, and welfare-related water management arise from the CEMP Works. However, a more extensive drainage strategy or standalone drainage appendix is not considered proportionate because the demolition works are short duration, localised in extent, and no discharge to watercourses is proposed. Proportionate temporary runoff, foul water, and weather-

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
					trigger controls are included in Section L.
M. Assessment of Potential Contamination Risk from CEMP Works (Policy)	X				
N. Contamination Prevention and Control	X				
O. Natural Environment	X				
P. Roles and Responsibilities (Policy)	X				
Q. Construction Traffic Management	X				
R. Greenhouse Gases (Procedure)	X				
Other Matters (Procedure)			X		CEMP Works do not affect the Kempston Hardwick moated site and do not require separate cultural heritage / archaeology

CEMP Section	Relevant	Relevant but not Proportionate	Not Relevant	Included Under Previous CEMP	Justification for Sections that are: relevant but not proportionate, not relevant or included under previous CEMP
					procedures beyond the relevant enabling conditions and separate submissions.

Sections identified as “Relevant but not Proportionate” are included in this CEMP in a proportionate, works-specific form, having regard to the limited scale, duration and nature of the Vine Cottages demolition works.

BACKGROUND, CONTEXT AND DESCRIPTION OF SITE

i. Introduction – The CEMP Works

This Construction Environmental Management Plan (CEMP) details the environmental management measures associated with the Demolition of Vine Cottages for the Universal Destinations & Experiences UK Project in Bedford ('the Authorised Development').

This CEMP has been prepared in substantial accordance with Reference Document 9 (the Outline CEMP) and has been tailored to the scale, duration, location, and risk profile of the Vine Cottages demolition works. In particular, Sections D, E, F and L are included in a proportionate, works-specific form, having regard to the limited duration and nature of the CEMP Works.

This CEMP covers the following works (hereafter referred to as the 'CEMP Works').

Aspect of CEMP Works	Description of CEMP Works	Duration of CEMP Works
Demolition of Vine Cottages	The complete removal of two traditional two-storey masonry buildings located on Manor Road, along with their associated outbuildings, planters, and all materials down to the base of foundations. Upon completion, the CEMP Land is to be left clean, secure, and ready for subsequent phases of the wider development. All waste arising from the CEMP Works will be removed from the CEMP Land in accordance with Section I: Construction Waste Management.	Permanent
Site Compounds	Temporary compounds will be established to provide welfare, storage, laydown and operational space, including access control measures, parking, plant storage, and site offices. The Vine Cottages compound is located within the CEMP Land. The Manor Road (Lake Zone) Compound is located within the Order land, but outside the CEMP Land. It will provide parking and additional welfare facilities and will be adapted in the future for the construction of the Temporary Roads (under a separate CEMP).	Temporary (Vine Cottages compound removed/reinstated by end 2026. Manor Road compound removed/reinstated by end 2029)

The demolition works themselves will be undertaken within the CEMP Land. Certain supporting welfare, parking, and logistics arrangements for the CEMP Works will utilise land within the Order land but outside the CEMP Land, as shown on the relevant **Appendix B** plans.

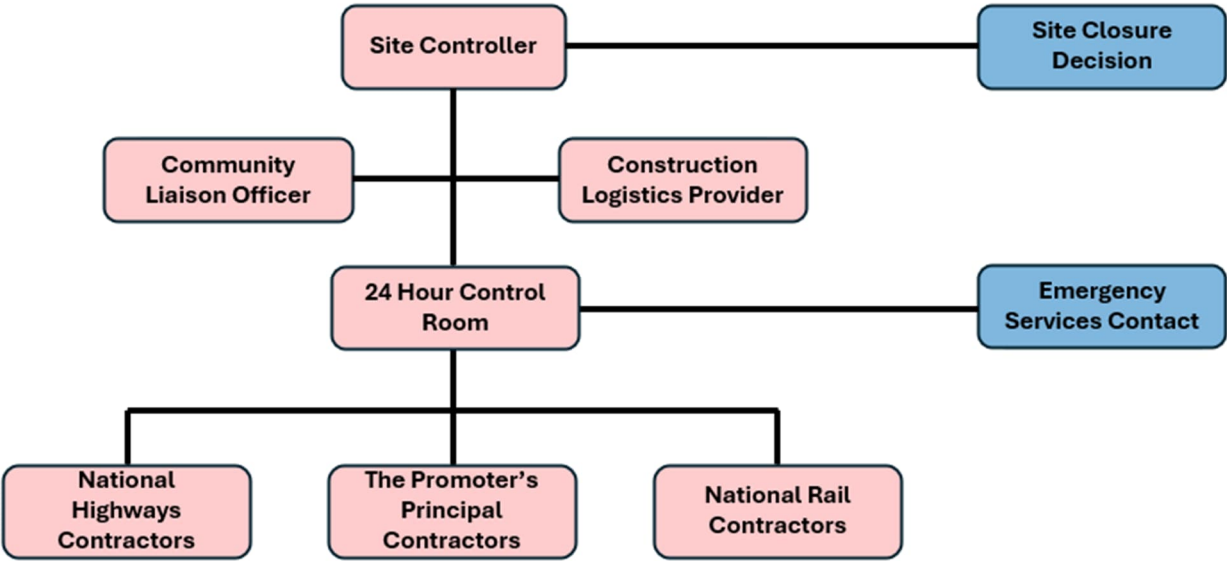
The CEMP Land Boundary and its location in relation to the rest of the Order land is shown in **Appendix A: CEMP Land Boundary (OS Plan)**.

All detail relating to construction traffic management, including construction routing, logistics, road, and footpath closures is presented in **Section Q: Construction Traffic Management**.

The location of compounds, access/haul routes, storage areas, and protected/retained environmental features (including demarcation/exclusion zones relevant to this CEMP) are shown on **Appendix B(1) – Vine Cottages Compound Layout**; **Appendix B(2) - Manor Road Compound (Lake Zone)**; and **Appendix B(3) – Manor Road Materials Laydown Area**.

ii. Management Structure (Policy)

The overall management structure of the Authorised Development shall be as follows (and further defined in following sections):



iii. Structure of this CEMP

The remainder of this CEMP has been structured to specifically follow the structure and requirements of Condition 12(3) in Schedule 3 of the Special Development Order (SDO).

A. GENERAL MANAGEMENT PROCESSES (PROCEDURE)

i Procedure for Audits and Inspections

- A.i.1 Internal environmental inspections and audits will be undertaken regularly during the CEMP Period. Routine inspections of CEMP Land will be conducted to ensure that environmental control measures are being effectively implemented. These inspections will apply the measures set out in this CEMP as the baseline for compliance. Any identified non-compliances and associated corrective actions will be recorded:
- Actions to resolve these non-compliances will be recorded and delegated to the relevant parties by the Central Site Manager;
 - These non-compliances and actions will be reported to the Central Community Liaison Officer (Central CLO); and
 - The Central CLO will record these non-compliances and corrective actions, as well as liaise with the respective regulatory bodies and/or relevant stakeholders.
- A.i.2 Responsibilities related to inspections and audits have been provided in **Table A-3**. Each follow-up inspection will begin with a review of outstanding actions from previous reports to confirm their completion.
- A.i.3 To adhere to the above, inspections will cover the following key areas during the CEMP Period:
- Audits will be carried out in accordance with details listed in this CEMP and contractual obligations (including any of The Promoter's Contractor Environmental Health and Safety Rules and Responsibilities documentation) to confirm that:
 - CEMP Works are progressing in accordance with the agreed method statements;
 - Agreed protection or mitigation measures are in place, prior to or during the implementation of CEMP Works; and
 - CEMP Works have been completed in accordance with the design and commitments made during the statutory process.
- A.i.4 Audits will be undertaken on a weekly basis throughout the CEMP Period.

Monitoring

- A.i.5 The Environmental Manager will have responsibility for maintaining a register of all required environmental monitoring related the CEMP Works, which will at all times be made available for auditing and inspection.

Environmental Issues

- A.i.6 Environmental issues not adhering to the CEMP Land's environmental standards as outlined in this CEMP that are identified either during audits or inspections, or that become apparent during the normal course of construction, will be recorded by the Contractor in an environmental tracker and communicated to the Site Controller. Any required actions will be carried out and closed out within an appropriate timeframe.
- A.i.7 Dissemination of information on environmental issues will take place as follows: meetings to discuss particular CEMP Works issues, method statements, task/activity briefings, toolbox talks, inductions,

environmental notices, and environmental alerts. Records that these have been carried out will be recorded on briefing registers.

- A.i.8 The Environmental Manager will ensure policies and procedures displayed on the CEMP Land notice boards (refer to **Paragraph C.ii.1**) are up to date. Supervisors will also be notified of any legislation changes which may affect working practices within the CEMP Land.

Reporting

- A.i.9 Reporting procedures, as shown in **Table A-1** below, have been defined by the Site Controller who will have ultimate responsibility for the environmental performance of the CEMP Works. A performance report for the CEMP Works will be issued on a weekly basis to the Site Controller. This report will include a summary of environmental inspections conducted, audits completed, any complaints, issues or environmental incidents recorded, the action taken to resolve the complaint, issue or environmental incident, and the date when the complaint, issue or environmental incident is closed out.

Table A-1 - Reporting Requirements

CEMP Ref	Report	Frequency	Responsibility
A.i.9	CEMP Performance Report	Following the CEMP Works	Central Site Manager
A.i.9	Regular internal environmental inspections	During 'high environmental risk' activities of the CEMP Works. These include: Demolition of Vine Cottages.	Central Site Manager and Contractor
D.i.10	Vibration Trigger Exceedance	After trigger levels are exceeded	Central Site Manager
C.i.3	CLO Reports	Following the CEMP Works	Contractor CLO
Q.ii.13	DMS Reporting	When any breaches of the HDV upper limits occurs	Transport Coordinator
Q.ii.21	CTMG Breach Report	If requirements of the CTMP are not being met	Contractor via their Transport Coordinator

Internal Communication

- A.i.10 Internal communication on environmental issues will take place through face-to-face conversations, email, telephone, and regular environmental meetings chaired by the Central Site Manager and attended by all relevant environmental team members. **Table A-2** below summarises the meetings required to satisfy the environmental conditions of the CEMP Works.

Table A-2 - Meeting Requirements

CEMP Ref	Meeting	Frequency	Responsibility	Description
A.i.7	Environmental Issues	Weekly	CEMP Works Site Manager	Meetings to discuss particular CEMP Work issues, method statements, task/activity briefings, toolbox talks, inductions,

CEMP Ref	Meeting	Frequency	Responsibility	Description
				environmental notices, and environmental alerts.
Q.ii.17	CTMG Meetings	Monthly	Contractor via their Transport Coordinator	Discuss monitoring report and agree any refinements to the CMTP.
Q.ii.19	CTMP Kick Off Meetings	CEMP Works Inception	Contractor	Reminder of the Contractors' standards and expectations as set out in contract documentation.

ii Competence, Training and Awareness (Procedure)

- A.ii.1 All of the CEMP Staff will complete corporate, CEMP Land and environmental inductions prior to commencing CEMP Works, covering health, safety and environmental requirements, CEMP Land-specific risks, environmental sensitivities, and mitigation measures.
- A.ii.2 Ongoing competence is maintained through regular toolbox talks, specialist training where required, and refresher training triggered by certification expiry, regulatory change, or audit outcomes.
- A.ii.3 Toolbox talks required as part of the CEMP Works include the following:
- Silica Based Products;
 - Dust and Air Quality;
 - Noise and Vibration;
 - Waste Management;
 - Operation of mobile plant;
 - Working adjacent to the live carriageway;
 - Manual handling;
 - Working at height;
 - Flood emergency measures;
 - Sustainable travel options;
 - Environmental standards;
 - Be a Good Neighbour; and
 - Worker Code of Conduct.
- A.ii.4 Competencies, qualifications, licences, and training records are centrally recorded and managed through the Contractor. Records are maintained electronically, reviewed periodically, and subject to internal audit, providing assurance that personnel remain suitably qualified and competent throughout the CEMP Period.
- A.ii.5 CEMP Staff development and performance are managed through continuous monitoring, supervision, and compliance checks. Where competency gaps or non-conformances are identified, corrective actions are implemented promptly, including retraining where necessary, to ensure ongoing compliance with environmental, health and safety, and CEMP Land-specific requirements.

- A.ii.6 Roles and responsibilities related to the environmental management of the CEMP Works of the Site Controller and Principal Contractor during the CEMP Period are identified in line with **Table A-3**. These roles will be performed by a combination of personnel and team structures. Note that roles and responsibilities of persons with suitable qualifications and experience to carry out, or advise on, other matters relating to the CEMP Works are defined in **Section P**.

Table A-3 - Roles and Responsibilities

Role	Responsibility
SITE CONTROLLER RESPONSIBILITIES	
Site Controller (or Designated UK Site Controller)	▪ Submitting a CEMP to the Secretary of State for endorsement before any CEMP Works (other than preliminary works) begin; and ensuring that no CEMP Works proceeds until the CEMP is endorsed; ▪ Total Order Land evacuation in a major accident, disaster or emergency events; ▪ Having regard to minimising cumulative adverse construction impacts across different CEMP Works; and ▪ Adhering to the enabling controls in the SDO.
Central Site Manager	▪ Overseeing CEMP Works Site Managers and environmental compliance reporting procedures, escalating relevant issues to the Site Controller.
Central Community Liaison Officer (Central CLO)	▪ Establishing and maintaining relationships with key stakeholders, the dissemination of the construction programme to all interested parties, and dealing with queries, responding to complaints and concerns that have been passed on by the Contractor CLO; ▪ Develop the procedure for handling CEMP Works complaints/concerns with the Central Site Manager; ▪ Issuing “look ahead bulletins” to neighbouring residents; ▪ Maintaining the notification systems outside standard working hours (Paragraph B.iv); and ▪ Investigating and responding to all noise-related enquiries.
Construction Logistics Provider (CLP)	▪ CEMP Land logistics (perimeter access/egress control, visitor/workforce induction, issue and management of access passes, management of general parking and storage areas, plant, material and waste storage areas, and CEMP Land perimeter security); ▪ Traffic Management of CEMP Works vehicles; and ▪ Order land cleanliness including wheel washing.
Central Community Liaison Officer (Central CLO)	▪ Establishing and maintaining relationships with key stakeholders, the dissemination of the construction programme to all interested parties, and dealing with queries, responding to complaints and concerns that have been passed on by the Contractor CLO;

Role	Responsibility
	- Develop the procedure for handling CEMP Works complaints/concerns with the Central Site Manager; - Issuing “look ahead bulletins” to neighbouring residents; - Maintaining the notification systems outside standard working hours (Paragraph B.iv); and - Investigating and responding to all noise-related enquiries.
Construction Traffic Management Group (CTMG)	Provides project-level review and oversight of construction traffic monitoring, compliance, refinements to CTMP measures and escalation of transport-related issues where required.
CONTRACTOR RESPONSIBILITIES	
CEMP Works Site Manager	Ensuring adherence to the CEMP, maintaining a safe working environment, and reporting of relevant issues to the Central Site Manager.
Contractor Environmental Manager (Environmental Manager)	Implementing the CEMP.
Contractor's Community Liaison Officer (CLO)	- Working with the CLP to act as the first point of contact for members of the public, recording relevant information such as the date and contact information associated with an in-person complaint/concern on a standard form and place a copy in a CEMP Works complaints register; and - Ensuring all local residents and stakeholders are kept informed of progress and key issues and escalating relevant information to the CLP.
Contractor Site Health and Safety Manager (Site Health and Safety Manager)	- Ensuring that Health and Safety procedures are adequately complied with for all day-to-day operations; and - Review and updating procedures for responding to environmental incidents, including approach to investigation and reporting throughout CEMP period along with EnvCoW.
Transport Coordinator (TC)	- Delivering and monitoring the construction traffic management measures outlined in the Section Q; and - Monitoring vehicle and active travel access to the CEMP Land.
Waste Manager	Acting as a Waste Champion who will enforce the requirements set out in Section I: Material Storage Management (Method Statement) and Section I: Construction Waste Management, set waste targets and monitor all waste movements within the CEMP Land and final disposal if regulated waste outside the Order Land.

iii Behavioural Standards for CEMP Staff (Standard)

- A.iii.1 The Promoter will implement a Worker Code of Conduct designed to set clear expectations for the behaviour of all workers, whether within the CEMP Land or in the local community. It will be the responsibility of the Contractor(s) to make sure its workers adhere to the code of conduct. The Worker Code of Conduct will be issued and briefed to all CEMP Staff as part of the mandatory CEMP Works induction (and included within the induction materials), delivered by the Contractor, and supported by the CLP where applicable, with reinforcement through toolbox talks and periodic briefings as required.
- A.iii.2 The Worker Code of Conduct, (the “Code” (**Paragraphs A.iii.3 to A.iii.6**)), aims to achieve the following:
- Explain the required behaviour of workers and outline the means by which the Code will be communicated. This requirement will also inform the local community of the standard of behaviour they should expect from the workers and their employers;
 - Inform workers about the consequences if the Code is not upheld; and
 - Recommend actions for workers when behaviours contrary to this Code have been observed.
- A.iii.3 The conduct of the entire Authorised Development workforce in the community is of the highest importance. The Code contains enforcement provisions designed to ensure that the entire workforce have no impact on the local community in terms of antisocial behaviour, vandalism, property destruction, or other types of social crime.
- A.iii.4 It is for this reason that everyone involved with the Authorised Development is expected to:
- a) Have due respect to their own safety and the safety of others by complying with all applicable laws, rules, and regulations including the Promoter’s processes and procedures;
 - b) Be ambassadors for the Promoter through behaviours and actions both within and outside the Order land by not engaging in any conduct or activity that may affect the Promoter’s reputation or otherwise cause embarrassment to the Authorised Development;
 - c) Understand that anti-social behaviour, discriminatory behaviour, or harassment will not be tolerated within or outside the Order land. Workers must respect colleagues and endeavour to maintain harmonious workplace relations at all times. It is never acceptable to use abusive or derogatory language towards others or inappropriately use emails and social media;
 - d) Come to work fit for work. Workers must ensure that they are not intoxicated by alcohol or under the influence of illegal drugs. Workers should not work under the influence of prescription drugs if they could reasonably expect that there may be effects on their work performance or on the safety of themselves or others. Alcohol and illegal drugs are not to be brought onto Order land;
 - e) Ensure no damage of any kind is caused to property both within and outside the Order land;
 - f) Ensure that any workers accommodation that may be provided is maintained in a tidy state with the proper disposal of rubbish;
 - g) Ensure that personal noise levels are appropriate to the time of day and location; and
 - h) Respect speed limits, be aware of other road users, agricultural vehicles, and livestock.

- A.iii.5 The Code will be re-enforced through communication mechanisms such as toolbox talks, the worker incentive and general communication networks highlighting positive engagement by workers in the community.
- A.iii.6 It is of the highest importance that the Code is respected by CEMP Staff at all levels. If someone acts in ways that are contrary to this Code, at least one of the following should be actioned:
- In the first instance discuss the person's behaviour with your immediate supervisor or line manager; and
 - Raise the matter with the relevant employer's human resources team who will investigate the complaint and, if appropriate, will follow their company disciplinary procedure which could lead to removal from the Authorised Development and potentially dismissal.

iv Prevention of and response to accidents and injuries to construction workers (Procedure)

- A.iv.1 Preventative measures to avoid accidents and injuries to construction workers are implemented through the structured health, safety, and environmental governance. All CEMP Works must be undertaken in accordance with approved RAMS that clearly outline task-specific hazards and control measures, supported by daily activity briefings, method-statement briefings, and ongoing supervision by the CEMP Works Site Manager. Compliance with competency requirements, including verification of qualified operatives and supervisors will be undertaken.
- A.iv.2 Higher risk CEMP Works such as work at height, operation of mobile plant, excavation, work adjacent to live carriageways, plant operations and temporary traffic management interfaces on the CEMP Land will be supervised by competent personnel and undertaken only by trained operatives.
- A.iv.3 Routine monitoring, via scheduled weekly audits, inspections and daily CEMP Land coordination, ensures that these high-risk activities are controlled through defined exclusion zones, supervision, and Permit-to-Work systems. These measures collectively ensure hazards are identified, communicated, and mitigated before work is undertaken.
- A.iv.4 CEMP Staff safety is further protected through mandatory adherence to CEMP Land rules, behavioural standards and environmental responsibilities as established in **Section A.iii**. All CEMP Staff will receive a CEMP Works induction covering CEMP Land rules, emergency arrangements, and key risks, which include:
- Operation of mobile plant;
 - Working adjacent to the live carriageway;
 - Manual handling; and
 - Working at height.
- A.iv.5 Management of these risks would occur through regular toolbox talks, pre-start briefings, and Risk Assessment Method Statement (RAMS) briefings. The Contractor will promote a positive safety culture through active consultation with workers within the Order land, visible management presence, and ongoing health and safety campaigns, ensuring that workers are informed, and encouraged to raise concerns from any observations of near-misses or other proactive health and safety suggestions.

- A.iv.6 The Contractor will ensure adequate first aid provision will be maintained at all times, with trained first aiders available within the Order land and the nearest Accident and Emergency facility identified and communicated to CEMP Staff. Emergency arrangements, including fire response, evacuation procedures and access for emergency services, will be clearly displayed and regularly communicated, with subcontractors required to include task-specific rescue arrangements within their method statements.

Where an incident involves actual or suspected risk to life, serious injury, fire, major pollution, or another matter requiring an urgent external response, emergency services will be contacted via 999 without delay. The CLP Operational Support Centre will then be notified so that site access, internal escalation and liaison with the responding emergency services and relevant regulatory authorities can be coordinated in accordance with **Section C**.

- A.iv.7 All accidents, incidents and near misses will be reported immediately and investigated in accordance with the Contractor's established accident investigation process. Incidents will be formally recorded and investigated to identify the immediate, underlying and root causes. These will be reported to the Promoter and enforcing authorities (such as the Site Health and Safety Manager) where required. Corrective and preventative actions will be implemented and tracked to completion, with lessons learned shared through safety alerts and briefings to prevent recurrence and drive continual improvement in health and safety performance within the Order land.

- A.iv.8 Whilst the CEMP Works do not directly interface with the Marston Vale Line or Midland Main Line, the Contractor acknowledges that the Order land boundary is not fully secured from the adjacent Network Rail land. The following controls will be in place to ensure CEMP Staff remain safe and no encroachment onto rail assets occurs:

- All CEMP Staff will be briefed during CEMP Works induction on the proximity of the live railway lines and the strict prohibition on approaching or crossing the boundary without written consent from Network Rail;
- Network Rail emergency contact details will be displayed within the Order land and included within the Site induction pack; and
- Any accidental encroachment or near-miss involving the railway will be reported immediately to Network Rail and treated as an environmental and safety incident under the CEMP incident response procedure.

B. CONSTRUCTION WORKING HOURS

The following working hours will be adhered to during the CEMP Works:

07:00 – 19:00 (Monday to Friday);

07:00 – 13:00 (Saturday); and

No Sunday, Bank Holiday, or Public Holiday working unless by prior approval for specific works. Any such prior approval for Sunday, Bank Holiday or Public Holiday working will be sought from Bedford Borough Council, with MHCLG notified in accordance with **Section B.iii**.

For the purposes of this CEMP, “night works” means any works undertaken between dusk and dawn. No night works are anticipated as part of the CEMP Works. If this changes, the CEMP will be updated under document control before any such works commence.

i First Hour Mobilisation Works (Standard)

- B.i.1 The first hour of any working day (07:00 – 08:00) is to consist of mobilisation works to include, but not be limited to, deliveries, movement to place of work, unloading, maintenance and general preparation works.

ii Activities Requiring Extended Construction Working Hours (Policy)

- B.ii.1 No CEMP Works are anticipated to require extended construction working hours.

iii Management and Emergency Notification for Out-of-Hours CEMP Activities (Standard)

- B.iii.1 Any amendments to programme and extension of the construction hours detailed in this CEMP will be agreed with Bedford BC in advance. The programme for extended working hours as well as the nature of these works, once agreed with Bedford BC will be shared with Ministry of Housing, Communities and Local Government (MHCLG) and notified to relevant stakeholders.
- B.iii.2 In the case of CEMP Works required in an emergency, or instances where CEMP Staff, public or environmental safety would be compromised if works were not completed, Bedford BC will be informed as soon as reasonably practicable of the reasons and likely duration, with a copy to MHCLG.

iv 24-Hour Work Details, Justification, and Notification Process (Standard)

- B.iv.1 24-Hour working will not be required for the CEMP Works.

C. ENGAGEMENT WITH THE NEIGHBOURING RESIDENTS

i Engagement and Communication with Residents and Adjoining Landowners on Anticipated CEMP Impacts (Procedure)

- C.i.1 The Site Controller will appoint an identified contact who will be responsible for fulfilling the role of the Central CLO for all CEMP Works on the Order land. The Central CLO will act as the primary point of contact for stakeholders and ensure consistency in the communication of programme information and environmental notifications.
- C.i.2 “Look-ahead” bulletins will be issued to the neighbouring residents by the CLP, which detail the location, nature, timing, and expected duration of any CEMP Works scheduled outside of the standard construction working hours, together with associated noise-control measures to be employed. Information will be distributed at least 5 working days in advance through real-time updates via the Community Update website ([Community updates | Universal UK Project](#)) and/or SMS alert system.
- C.i.3 Each Contractor will appoint a Contractor CLO for their respective CEMP Works, responsible for managing local liaison activities and responding to in person resident enquiries related to their works. CLOs will report to the CLP on a weekly basis, providing updates on upcoming activities, community issues raised and actions taken.
- C.i.4 **Appendix C: Properties to be Notified of CEMP Works** identifies the properties to be notified of the CEMP Works. Properties within the 100m Notification Area will be included within the CEMP Works notification distribution list (subject to address verification and data protection requirements). Notifications will be issued by the CLP and coordinated by the Central CLO, in liaison with the Contractor CLO, and will include the location, nature, timing and expected duration of the CEMP Works together with the primary contact/complaints route.

ii Complaints Procedures for Impacts from CEMP Works (Procedure)

- C.ii.1 Signage will be displayed at prominent positions around the Order land providing contact details for the receipt of incidents, emergencies, and complaints. The notices will include the CLP’s 24-hour Operational Support Centre contact number, and an applicable email address. These numbers will be used for incident reporting and emergencies plus those requiring out of hours response.

Complaint and/or Emergency Escalation Process (Procedure)

- C.ii.2 The CLP’s 24-hour Operational Support Centre (OSC) Control Room contact number is +44 (0)20 3794 6090. This number will be used for incident reporting, emergencies and those requiring an out of hours response.

Where an incident involves actual or suspected risk to life, serious injury, fire, major pollution, or another matter requiring an urgent external response, emergency services will be contacted via 999 without delay. The CLP Operational Support Centre will then coordinate site access, internal escalation and liaison with the responding emergency services and relevant regulatory authorities.

Emergency Response (Procedure)

- C.ii.3 This following section outlines the emergency response arrangements for the CEMP Land, including roles and responsibilities, evacuation procedures, incident escalation, and coordination with the emergency services and relevant regulatory authorities.

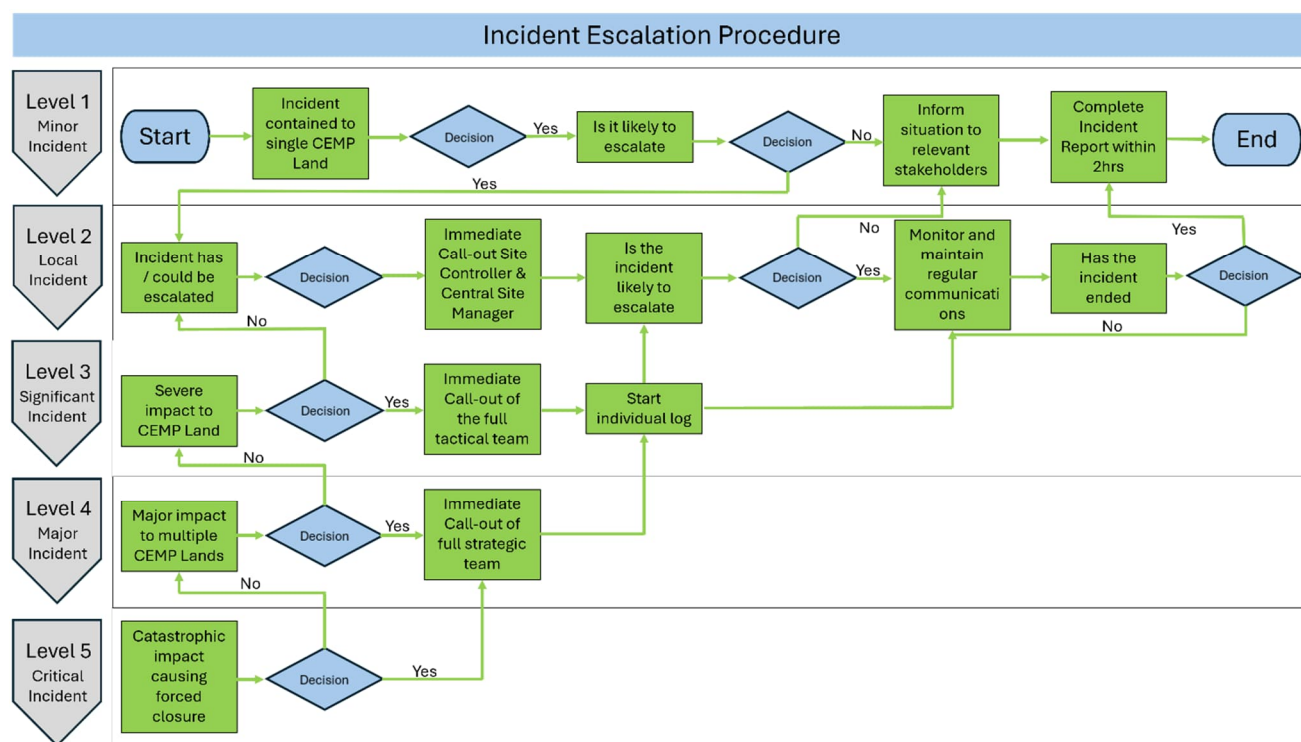
- C.ii.4 The CLP Project Incident and Health & Safety Plan provides the detailed operational arrangements, contact lists, forms and scenario-specific response actions for CLP-led incident response and is to be read in conjunction with this CEMP. For the CEMP Works, the incident command, escalation, and decision-making structure set out in this CEMP shall apply, with the CLP OSC acting in a communications and support role.
- C.ii.5 The incident response arrangements apply to spills, leaks or failures of storage and containment systems for hazardous and potentially polluting materials, including escalation, containment, clean-up, and notification requirements.
- C.ii.6 In the event of an emergency, the severity level shall be determined to inform escalation level. This shall be done in accordance with the requirements of the Incident Escalation Standard Operating Procedure (SOP) (
- C.ii.7 **Figure C-1).** The procedure outlined below captures the classification of incident severity and the escalation process.

Emergency Command Structure

- C.ii.8 In the event of an incident or emergency, the CEMP Works Site Manager will take immediate local control of the affected area and implement any necessary stop-work and make-safe actions. The Central Site Manager will assume tactical control for the CEMP Works and will determine, with input from relevant specialists, whether escalation beyond the local incident response is required. The Site Controller retains overall strategic command for incidents with the potential to affect multiple work areas, third parties, public safety, or the wider Order land. The CLP's OSC provides communications and reporting support, but does not act as the decision-making authority for incident command.
- C.ii.9 During the CEMP Period, once issued and in force, the CLP Project Incident and Health & Safety Plan will provide the detailed operational arrangements, contact lists, forms, and scenario-specific response actions for CLP-led incident response. Once in place, the CEMP Works Site Manager will liaise with the CLP Incident Co-ordinator/Nominated Manager (or equivalent named incident lead in the CLP plan in force at the time) and will follow the relevant procedures in that plan as far as they support the response to an incident affecting the CEMP Works. For the avoidance of doubt, the

incident command, escalation, and decision-making structure set out in this CEMP shall continue to apply to the CEMP Works, with the CLP Incident Plan operating as a supporting operational document.

Figure C-1: Incident Escalation Procedure



In accordance with the Incident Escalation Procedure above, Table C-1 below are the implied timings for each security Level 1-5:

Table C-1: Incident Escalation procedure Implied Timings for Response

Implied Timings	Clause
0 – 5 mins	Identify incident, stop work if needed, declare provisional severity, contact emergency services where life/safety/security thresholds are met
5 – 15 mins	Confirm incident lead, establish local/tactical control, start internal call-out, issue first situation report for lower-level incidents
15 – 30 mins	Tactical or strategic structure stood up for Levels 3 - 5
Every 30 mins	Review/update cycle while incident remains live
Within 2 hrs of the incident closedown	Internal incident report completed
Within 24hrs of incident closedown	Formal major incident announcement

Emergency Contacts

C.ii.10 The following emergency contacts are to be displayed on CEMP Land signage:

Primary Emergency Number

- CLP Operational Support Centre (OSC): +44 (0)20 3794 6090 (displayed at all CEMP Land entrances and other key areas along the perimeter of the CEMP Land)

Emergency Services

- Police, Fire and Rescue, and Ambulance: 999

D. NOISE AND VIBRATION

The CEMP Works are not considered to warrant a standalone Noise and Vibration Assessment due to the short duration of works (2–3 weeks) and the limited scale and nature of demolition activities. In line with the noise and vibration mitigation measures set out in **Section D.iii**, the Contractor will apply Best Practicable Means (BPM) throughout the demolition period. These measures, together with adherence to standard construction working hours, will be monitored so that demolition noise and vibration remains within the prescribed limits in **Table D-1** and **Table D-2**.

All plant and equipment used will be checked daily and well maintained as per manufacturers' instruction, and operated in accordance with best practice guidance, for the control of noise and vibration on construction sites, therefore no secondary mitigation measures have been proposed.

Compliance monitoring will follow a trigger and action-based framework with routine noise checks within the Order land and supervisor review of activities if threshold levels are approached. Should any exceedance occur, works will cease and alternative methods or enhanced mitigation measures will be implemented. Given the short, low impact nature of the demolition activities of the CEMP Works, the embedded controls and monitoring arrangements within the CEMP provide a proportionate and effective means of managing noise and vibration without the need for a standalone assessment.

i. Prescribed noise and vibration limits (Standards)

- D.i.1 Noise and vibration limits have been set, in order to avoid unacceptable disturbance to sensitive receptors in the vicinity of the works.

Noise Limits

- D.i.2 A framework for assessing the potential significance of construction noise has been established in line with recognised best practice guidance. For the purposes of monitoring and control during the CEMP works, the façade-level action limits at noise sensitive receptors are:

- 65 dBLAeq,T during the daytime (07:00–19:00);
- 55 dB LAeq,T during the evening / weekends (19:00–23:00 on weekdays, 13:00–23:00 on Saturdays, and 07:00–23:00 on Sundays/Public Holidays); and
- 45 dB LAeq,T during the night-time (23:00–07:00).

- D.i.3 These limits apply at, or are assessed by reference to, the nearest representative noise and vibration sensitive receptor locations identified in **Table D-1**.

Vibration Limits

- D.i.4 A framework for assessing the potential significance of construction vibration has been prepared and is based on best practice guidance. The Prescribed Vibration Limit has been set at a level of 2 mm/s, PPV, as set out in
- D.i.5 **Table D-2**.

ii. Compliance Monitoring (Policy)

This section sets out the following:

- Compliance monitoring strategy;
- Trigger and action levels; and
- Response procedure.

Noise Monitoring

Noise monitoring for the CEMP Works will be undertaken at agreed accessible locations close to the CEMP Land boundary (and, where required, within the CEMP Land), and selected to be representative of the nearest Noise Sensitive Receptors (NSRs) relevant to the CEMP Works, as described in **Table D-1**.

Table D-1 - Noise and vibration sensitive receptors close to the CEMP Land boundary

Noise sensitive receptor reference	Description (where required, these will be located within the CEMP Land)	Town/village location	Receptor category	Approximate No. of properties
MON03	Properties to the south of Manor Road	Kempston Hardwick	Residential	5
MON04	Properties off Manor Road	Kempston Hardwick	Residential	15

D.i.6 Email/SMS text alerts will notify CEMP Works management of an exceedance of pre-set threshold levels, as set out below. A two-stage approach will be employed with 'Action levels' and 'Trigger levels' set at the values in

D.i.7 **Table D-2**, the latter being an early warning that noise levels are approaching the Action levels, which are set at the level of the Prescribed Noise Limits.

Table D-2 - Noise monitoring Trigger and Action levels at Noise Sensitive Receptors

Period	Measured construction noise level, $L_{Aeq,T}$ dB (façade)	
	Trigger Level	Action Level
Daytime (7am to 7pm)	62	65
Evenings and Weekends: Weekday evenings (7pm to 11pm) Saturday afternoon (1pm to 11pm) Sundays and Public holidays (7am to 11pm)	52	55
Night (11pm to 7am)	42	45

Vibration Monitoring

D.i.8 Vibration monitoring will be undertaken at locations close to the Order land boundary. The locations have been chosen to represent receptors likely to be worst affected by the CEMP Works.

- D.i.9 Trigger and Action levels are set out in **Table D-3** below. The Action level is set at the level of the Prescribed Vibration Limit.

Table D-3 - Vibration monitoring trigger and action levels

Vibration Trigger/Action Level	Vibration Level (PPV mm/s)
Trigger Level	1
Action Level	2

Response Procedure

- D.i.10 Exceedance of the Trigger levels will be responded to as follows:
- If, during CEMP Works, trigger levels are exceeded, this will be reported to the designated CEMP Works Site Manager who will report to the Central Site Manager. If appropriate, the Environmental Manager will also be liaised;
 - Investigate the CEMP Works being undertaken, to see if the correct plant and equipment are being used in accordance with BPM;
 - If the work, plant, and equipment are not being used correctly the CEMP Works will be stopped and corrective action taken;
 - If the correct plant and methodology are being followed, but high levels are still being generated and are likely to exceed the prescribed noise or vibration limits (the Action levels in **Table D-2** and **Table D-3**), further mitigation measures or alternative working practices will be adopted which generate lower noise and/or vibration levels in order to avoid the prescribed noise and vibration limits being exceeded; and
 - The response procedure and outcome will be recorded by CEMP Staff.
- D.i.11 Exceedance of the Action levels will be responded to as follows:
- If, during CEMP Works, Action levels are exceeded, this will be reported to the designated CEMP Works Site Manager who will report to the Central Site Manager. If appropriate, the Environmental Manager will also be liaised; and
 - The relevant CEMP Works will stop so that corrective actions can be considered and implemented. Corrective action will be taken, such as the use of further mitigation measures or alternative working practices, in order to avoid the prescribed noise and vibration limits being exceeded.
- D.i.12 Where temporary exceedances of the Action levels occur due to unforeseen circumstances and the correct methodology, plant and BPM have been observed, MHCLG (and, if appropriate, affected neighbours) will be notified and the reasons and timescales explained, with Bedford BC informed.

iii. Noise and Vibration Mitigation Measures (Policy)

Noise Measures

- D.i.13 General measures:

- Noise and vibration will be reduced by careful selection of less intrusive plant and/or methods of CEMP Work, for example, breaking-out of concrete structures using, where practicable, low noise methods such as munching or similar, rather than percussion breaking;
- Advice and training on noise minimisation will be given to CEMP Staff during induction procedures;
- All plant brought onto CEMP Land will comply with the relevant EC/UK noise limits applicable to that equipment or shall be no noisier than would be expected based on the noise levels quoted in best practice guidance. Each plant item will be well maintained and operated in accordance with manufacturers' recommendations;
- Deliveries to the CEMP Land will be programmed and routed to reduce disturbance to local residents; and
- Items of plant operating intermittently will be shut down in the periods between use.

D.i.14 Measures specific to the CEMP Works:

- Where required to reduce impacts at nearby sensitive receptors, higher-noise activities will be scheduled to avoid the more sensitive parts of the day and will not be undertaken concurrently where this would materially increase combined noise levels;
- In general, plant and material storage areas will be located away from the CEMP Land boundary, to limit impact on nearby sensitive receptors; and
- Where practicable, all stationary plant will be located so that the noise effect at receptors is reduced.

The details and location of these measures are included in **Appendix B: Description of the CEMP Works and Arrangements for Site Welfare, Fencing and Construction Equipment**.

Vibration Measures

- Where reasonably practicable, plant and/or methods of CEMP Work causing significant levels of vibration at sensitive premises will be replaced by other less intrusive plant and/or methods of working;
- To reduce any potential adverse impacts as a result of vibration from stationary plant, equipment will not be located immediately adjacent to sensitive receptors; and
- The characteristics of vibration emissions from each item of plant, and their collective effect, will be assessed during the selection process for the acquisition of plant. Where practicable, plant will be selected which will have the least impact in terms of vibration.

E. CONTROL OF DUST AND OTHER EMISSIONS TO AIR

- E.i.1 It is deemed that the CEMP Works are unlikely to generate exceedances above the IAQM directed site action level of 190ug/m³ over a 1-hour averaging period. Therefore, inclusion of this section is not deemed proportionate to the CEMP Works. The CEMP Works undertaken on CEMP Land have limited potential for emissions to air as they do not include operations known to generate elevated emissions to air such as extensive grinding, grit blasting, or crushing and will be undertaken by plant operating under Euro 6 emissions standards.
- E.i.2 If visible dust emissions arise from the CEMP Works such that they are likely to cause nuisance or are likely to exceed the relevant action benchmark, the relevant activity will be reviewed immediately and appropriate corrective measures will be implemented. These may include damping down, reducing drop heights, covering, or containing arisings, changing the sequence of works, or temporarily pausing the activity until conditions improve.

F. MATERIAL STORAGE MANAGEMENT (METHOD STATEMENT)

- F.i.1 A detailed Materials Management Plan is therefore not considered proportionate for the CEMP Works and is omitted from this CEMP.
- F.i.2 All necessary environmental controls shall be provided as necessary during relevant CEMP Works. As applicable, these measures include:
- Protection of surface water drains and catchments of surface run-off to reduce the risk of contaminated run-off and high-suspended solids moving outside the Order land;
 - Management of stockpiles of demolition wastes and potentially contaminated waste awaiting disposal outside the Order land and/or within Order land treatment to minimise the potential for generation of contaminated run-off and dust; and
 - Use of dust and odour suppression techniques during development to minimise impacts outside the Order land.
- F.i.3 Compliance will be ensured by the Contractor with relevant legislation technical guidance and regulations in the identification, handling, storage, recovery, and disposals of waste. Provision will be made for a suitably qualified consultant appointed by the Contractor to identify “hazardous waste” so that materials can be appropriately managed and disposed of during CEMP Works.
- F.i.4 In addition to the controls set out in this CEMP, storage and handling of fuels, oils, chemicals, and other potentially polluting materials will comply with all relevant legislation and recognised good practice, including the applicable oil storage, pollution prevention, and environmental permitting requirements in force at the time of the CEMP Works.
- F.i.5 If identified, hazardous materials will be segregated in labelled, closed containers or stockpiles to minimise the risk of cross-contamination.
- F.i.6 Fuel, oil and chemicals will be stored in secondary containment and located a minimum of 10m from any watercourse.
- F.i.7 The secondary containment system will provide storage of at least 110% of the tank’s maximum capacity and ensure that any valves, filters, sight gauges, vent pipes, or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges are contained.

G. SOILS MANAGEMENT

- G.i.1 A Soils Management Plan (SMP) is not required for the CEMP Works due to the anticipated volume being less than 100m³. Any excavated material will be managed as per **Section F: Material Storage Management (Method Statement)** and disposed of as required by **Section I: Construction Waste Management**.

H. ARRANGEMENTS FOR SITE WELFARE, FENCING AND CONSTRUCTION EQUIPMENT AND PLANT

i. Site Compounds and Facilities (Plan)

- H.i.1 The Site compounds and facilities shown in **Appendix B: Description of the CEMP Works and Arrangements for Site Welfare, Fencing and Construction Equipment** have been designed to provide greater provision than the requirements for CEMP Staff that are anticipated to utilise these compounds to carry out CEMP Works. These compounds and facilities have been located and designed to minimise visual impact.
- H.i.2 The Vine Cottages compound is located within the CEMP Land.
- H.i.3 The Manor Road (Lake Zone) Compound is within the Order land, but outside the CEMP Land. It will provide parking and additional welfare facilities, and facilities and will be adapted in the future for the construction of the Temporary Roads (under a separate CEMP).

ii Temporary Fencing and Hoardings (Plan)

- H.ii.1 Arrangements for temporary fencing, hoardings, and other security measures are shown in **Appendix B** including their locations and details of their appearance to minimise visual impact.

iii Construction Equipment and Plant (Plan and Procedure)

- H.iii.1 The following measures related to arrangement of construction equipment and plant will be implemented.
- H.iii.2 Appropriate stockpile segregation, locations, and containment measures will be implemented to minimise the exposure of surface water and groundwater from contaminated run-off and CEMP Staff and local neighbours from any windblown dusts, and vapours. These measures will include:
- The use of impermeable sheeting or geotextile membranes beneath contaminated stockpiles to prevent leachate entering the ground;
 - Maintaining a distance of 10m from watercourses, drainage channels, and discharge points;
 - Covering stockpiles with tarpaulins or geotextiles to minimise dust and vapour emissions;
 - The installation of perimeter silt fencing or bunding to contain run-off and capture sediment during rainfall events; and
 - Regularly damping down stockpiles and restrict handling during dry or windy conditions to minimise dust generation.
- H.iii.3 Measures to limit landscape and visual impacts from site welfare facilities, fencing and storage will include:
- Plant and material storage areas will be located away from the CEMP Land boundary. However, based on construction logistics, hoarding will be located close to the CEMP Land boundary in areas where no existing vegetation is being retained and where it does not impede construction access to the CEMP Land, to help screen views for neighbouring residents at Kempston Hardwick; and
 - Visual clutter associated with CEMP Works will be further limited through appropriate storage of materials/plant/equipment, and management of materials and waste on CEMP Land.

H.iii.4 The maximum operating height of construction equipment is 20m.

I. CONSTRUCTION WASTE MANAGEMENT

i. Storage and Segregation of Waste (Procedure)

- I.i.1 Dedicated, clearly marked waste storage areas must be established within the Order land, positioned away from watercourses and sensitive receptors, and maintained securely. Separate skips for mixed construction waste, metals, and wood, with all containers checked on arrival to ensure they are serviceable and suitable. Measures such as enclosed skips, tarpaulins, dust suppression, and proper drainage controls will be mandated to prevent nuisance, cross-contamination, and environmental harm.
- I.i.2 CEMP Staff on the Site Compound will separate waste into dry recyclable materials (plastic, metal, glass, paper, and card) food waste non-recyclable waste (also called residual waste).
- I.i.3 Waste segregation follows the waste hierarchy by maximising opportunities for reuse and recycling. Materials must be stored cleanly and correctly labelled to reduce contamination and improve acceptance at recycling facilities. Hazardous and non-hazardous wastes must be properly characterised as per best practice and technical guidelines, with hazardous materials stored with secondary containment where required. CEMP Staff are responsible for ensuring compliance, monitoring segregation practices, and preventing mixing of waste streams.

ii. Removal of Waste from the CEMP Land (Procedure)

- I.i.4 All waste leaving the CEMP Land must be transported by a registered waste carrier, accompanied by a Waste Transfer Note (WTN) or Hazardous Waste Consignment Note, which must be retained for the required statutory period.
- I.i.5 Before removal, the Waste Manager will verify that all destination facilities are appropriately licensed and permitted. Vehicles transporting waste must be secured to prevent escape of materials, and all waste movements will be logged and reviewed to ensure compliance with environmental legislation, and the Authorised Development's waste hierarchy objectives, including maximising reuse and recycling and minimising disposal to landfill.

J. CONSTRUCTION LIGHTING MANAGEMENT

- J.i.1 This section is omitted because all CEMP Works will be undertaken during normal working hours and no night works (being works undertaken between dusk and dawn) are anticipated. If this changes, the CEMP will be updated under document control before any such works commence.

K. STRATEGY FOR PILING OPERATIONS AND ASSOCIATED RISK ASSESSMENT

- K.i.1 This section is omitted because there are no piling activities in the CEMP Works. Therefore, this section is not relevant.

L. MANAGEMENT OF SURFACE WATER

For the purposes of this CEMP, the temporary surface water / runoff arrangements for the CEMP Works comprise localised interception, containment, settlement, and controlled removal of water arising from demolition, welfare, and wheel-cleaning activities within the CEMP Land. No discharge to watercourses is proposed as part of the CEMP Works. This section is to be read together with **Section N: Contamination Prevention and Control**, which sets out the associated contamination prevention and pollution control measures.

i Temporary Structures (Procedure)

- L.i.1 Controls will be applied proportionately to risk, with increased supervision and inspection frequency during higher-risk activities (e.g. dewatering, stockpiling near drainage pathways, refuelling/plant maintenance, and wheel cleaning).
- L.i.2 The following temporary runoff / drainage measures will be implemented during the CEMP Period:
- Water arising from demolition activities, wheel cleaning and any localised dewatering will be intercepted, contained, and managed within the CEMP Land through temporary controls appropriate to the activity and location;
 - Where settlement / treatment is required, temporary drainage features (such as drainage blankets, land drains, gravel traps, or similar localised measures) will be used to prevent untreated, sediment-laden, or contaminated water from entering unmade ground, surface water drains or watercourses;
 - Any water requiring off-site removal will be collected and removed by an appropriately authorised contractor; and
 - The temporary controls will be inspected at an appropriate frequency during the CEMP Works and following significant rainfall events, and maintained / repaired where required so that they remain effective.
- L.i.3 No discharge to watercourses is proposed as part of the CEMP Works.
- L.i.4 The temporary runoff / drainage controls for the CEMP Works will be implemented within the CEMP Land in accordance with the relevant compound / access layouts and maintained under the Contractor's site controls throughout the CEMP Period.
- L.i.5 Given the limited scale, duration and localised nature of the CEMP Works, a separate drainage plan / schematic is not considered proportionate, and the temporary runoff / drainage controls will instead be implemented through the site controls, compound arrangements and temporary measures described in **Section L** and shown, where relevant, on the **Appendix B** layout plans.

ii Flood Emergency Measures (Procedure)

- L.ii.1 Flood emergency measures include the following:
- Contractor will sign up for flood warnings and check online warnings regularly when appropriate (i.e. following periods of heavy rainfall to receive accurate warning before a flood event with adequate time to evacuate, undertake pre-emptive flood protection tasks and/or take safe refuge depending on the scale of the warning/alert). The Central Site Manager will endeavour to ensure

that everyone on the CEMP Land is aware of the situation during a flooding event and whether evacuation may be necessary;

- Depending on the scale of the warning/alert, the Central Site Manager will monitor the local news and forecasts to decide whether it is prudent to close and evacuate the premises or seek refuge within Core Zone and East Gateway Zone where flood risk is lowest. In the event of CEMP Land closure, the Central Site Manager will secure utilities and equipment, deploy flood defences where required, ensure safe evacuation or refuge as appropriate, and make all CEMP Staff aware of the situation, with on ground emergency services instructions taking precedence;
- In case of an evacuation, the Site Controller will act on advice from Bedford BC and the emergency services, ensuring vulnerable people are protected and that evacuation through established routes safe (along Manor and Broadmead Road) from floodwater is undertaken with extreme caution and safety measures. If evacuation of the CEMP Land is not possible, safe refuge can be found in the Core Zone and East Gateway Zone;
- Reoccupation of the CEMP Land will be undertaken once flooding warnings are lifted and Bedford BC confirms it is safe, with the Central Site Manager implementing recovery measures to address hazards, utility safety, structural damage, and access restrictions;
- Awareness training sessions will be conducted during site induction and toolbox talks by the CEMP Works Site Manager for CEMP Staff to familiarise them with the procedures to be followed for potential flooding events, CEMP Land-specific flood risks, information of flood kits, emergency contacts and roles of the various authorities involved; and
- CEMP Staff will be made aware of CEMP Land-specific flood risks from rivers, surface water, and ground water sources during the CEMP Works induction. Existing flood zones and flood risk sources will be used to inform and support CEMP Works where appropriate (e.g. phasing, stockpiling, machinery storage, and method statements).

iii Potable and Foul Water (Procedure)

- L.iii.1 Potable water for welfare facilities within the CEMP Land will be supplied via a tankered supply to the CEMP Land welfare unit. The Contractor will source water from an area that:
- Is not considered as seriously water stressed by the Environment Agency;
 - Does not negatively impact Groundwater Dependent Terrestrial Ecosystems (GDTE); and
 - Does not negatively impact the supply of fresh water to statutory designations.
- L.iii.2 Conservation measures will be implemented in relation to CEMP Works water supplies that are required for CEMP Staff, sanitary facilities, and wheel washing. Measures to reduce the potable and non-potable water use within CEMP Land include:
- Specification of low flow water supply equipment to reduce incoming demand during CEMP Works;
 - Education of CEMP Staff conserving water e.g. switching off taps, plant, and equipment when not in use; and
 - Wheel washing recycling systems (e.g., collection of used water, filtering debris/sediment, and reuse for washing supply purposes).

- L.iii.3 Any reference to temporary drainage connections relates only to temporary welfare/temporary site drainage arrangements within the CEMP Land unless otherwise stated. No temporary connection to off-site sewerage or drainage infrastructure will be made unless the necessary permissions / consents and any relevant Order land requirements are in place, and the connection has been designed and implemented so as to avoid adverse effects on the receiving network and water environment.
- L.iii.4 Disposal of foul water arising out of the CEMP Works during the CEMP Period will be through:
- A self-contained welfare unit with a holding tank will be used, with regular pump-out and removal outside of the CEMP Land to be disposed by a licensed waste carrier;
 - Disposal will be to a suitably permitted local wastewater treatment works in the Anglian Water region, undertaken by a licensed waste carrier. Where practicable, disposal to a treatment facility within the Bedford area will be specified; however, final discharge locations may vary depending on the operational arrangements of the appointed waste contractor;
 - No wastewater will be discharged to ground, surface water drains, or any watercourses;
 - Process water (e.g. from wheel washing) will be collected, filtered of sediment, and recycled within the CEMP Land where possible. Any surplus will be disposed of via licensed waste carrier; and
 - Septic tanks and any temporary drainage connections will be regularly maintained and inspected to prevent risk of leakage or contamination to groundwater, surface water drains or any watercourses.
- L.iii.5 Foul water will be managed so as to avoid adverse effects on sensitive receiving environments. Where foul water is removed by tanker, it will be disposed of at an appropriately permitted facility by an authorised contractor. Where any off-site connection/discharge is proposed, it will be progressed only where compliant with the applicable regulatory/consenting requirements and with due regard to Water Framework Directive considerations for the receiving water environment and, where applicable, any nutrient neutrality requirements.

iv Works Near Water Bodies or Watercourses (Method Statement)

For the purposes of this section, references to water bodies or watercourses include surface water drains, drainage ditches, outfalls, and other surface water drainage features where present. This section is to be read together with **Section N.ii** (Prevention of Contamination of Watercourses), **Section N.iii** (Managing Wheel Cleaning Facilities) and **Section N.iv** (Containment Structures and Systems for Refuelling of Construction Plant).

- L.iv.1 The following measures are to be implemented near water bodies or watercourses:
- High risk activities of the CEMP Works (e.g. mixing of materials, hazardous materials storage, fuel storage tanks) are not to be undertaken within 10m of the water's edge/bank top of any water bodies and drainage systems.
- L.iv.2 Planning and set-up (before CEMP Works commence in the CEMP Land):
- Before CEMP Works commence in the vicinity of water bodies, watercourses or surface water drainage features, the Contractor will confirm the working limits, identify nearby water receptors (including surface water drains/outfalls where present) and establish the required demarcation/exclusion zones and any temporary runoff controls appropriate to the activity.

- L.iv.3 Sediment and runoff controls (during CEMP Works):
- Temporary runoff interception and treatment measures will be implemented and maintained so that untreated, silt-laden runoff does not enter water receptors. Controls may include (as appropriate to risk and location) grips/swales to settlement features, silt fencing at sheet flow edges, stabilisation/covering of exposed soils, and protection of drainage inlets/outfalls where present.
- L.iv.4 Working practices and weather triggers:
- During periods of heavy rainfall, high flows or where erosion risk is elevated, high-risk activities will be modified, resequenced or temporarily paused and protective measures maintained (e.g. stabilisation/covering of exposed soils) until conditions improve.
- L.iv.5 Inspection and maintenance:
- The Contractor will inspect runoff/sediment controls at an appropriate frequency during CEMP Works and following rainfall events, maintain/repair controls as required, and record inspections and corrective actions in the CEMP log.
- L.iv.6 Incident response (sediment release/pollution event):
- If a sediment release, spill, or control failure occurs, CEMP Works will stop locally, the release will be contained and cleaned up, and the incident will be recorded and escalated in accordance with the CEMP incident management arrangements. CEMP Works will recommence only once controls are reinstated and confirmed effective.
- L.iv.7 Other appropriate measures to protect the water environment to eliminate or minimise risk to aquatic habitats, flora, and fauna will be implemented in accordance with **Section O: Natural Environment**, under Aquatic Ecology.
- L.iv.8 These measures are to be read in conjunction with **Section N: Contamination Prevention and Control** and shall be applied consistently with the watercourse protection measures set out in that section.

M. ASSESSMENT OF POTENTIAL CONTAMINATION RISK FROM CEMP WORKS (POLICY)

- M.i.1 This section provides the assessment required by Condition 12(3)(m): whether the CEMP Works will give rise to a 'relevant contamination risk', being a risk arising from CEMP Works on part of the Order land where the carrying out of that CEMP Works will cause significant harm or significant pollution, or a significant possibility of significant harm or significant pollution.
- M.i.2 For the purposes of Condition 12(3)(m), this assessment considers both:
- risks arising from historic contamination identified through available site condition reporting and investigation information; and
 - risks arising from the demolition activities and associated supporting operations proposed under this CEMP, including excavation, stockpiling/handling, dewatering where applicable, refuelling/plant maintenance, wheel cleaning and haul route operations.
- M.i.3 This assessment has been prepared by a suitably qualified contaminated land practitioner for the purposes of this submission.
- M.i.4 **Section N** includes the summary Land Contamination Statement Notice, confirming areas of no/low contamination risk for the purposes of Condition 14(6)). The CEMP Works are not expected to give rise to a relevant contamination risk in areas confirmed as no/low risk, provided the CEMP controls are implemented.
- M.i.5 The CEMP Works include activities that may give rise to relevant contamination risks, such as the establishment of temporary construction compounds. These risks include, for example, fuel spillages and the potential exposure of contaminated ground. The key relevant contamination risks anticipated to arise from the CEMP Works are set out below:
- M.i.6 Disturbance of Potentially Contaminated Ground:
- Expose and mobilise previously undisturbed contamination such as hydrocarbons, heavy metals, ash, clinker, or asbestos-containing material (ACM), particularly in areas close to historic infrastructure or made ground;
 - Generate contaminated arisings, which if not properly managed, disposed of, could lead to secondary contamination of adjacent soils or watercourses;
 - Increase airborne dust containing contaminants, posing risks to CEMP Staff, nearby receptors, and ecological habitats; and
 - The vicinity of the existing level crossing, former utility corridors, and historic road margins can have elevated risk due to legacy railway operations, buried services, or informal tipping.
- M.i.7 Contamination from Construction Plant, Vehicles and Materials:
- Fuel, oil, hydraulic fluid or coolant leaks from vehicles or static plant, resulting in localised soil or groundwater contamination;
 - Accidental spillage of fuels or construction chemicals during refuelling, servicing, or chemical handling; and

- These risks are heightened during wet weather, where spills can migrate more easily across hardstanding or into drainage features.

M.i.8 Runoff, Sediment Transport and Mobilisation of Pollutants:

- Sediment-laden runoff entering ditches, drains or watercourses, reducing water quality;
- Mobilisation of contaminants bound to fine soils or silts, increasing the risk of downstream pollution; and
- Increased erosion from stockpile areas, especially during periods of heavy rainfall.

M.i.9 Risks from Temporary Construction Compound Operations:

- Fuel and chemical storage failures, such as damaged bunds or incorrectly stored Intermediate Bulk Containers (IBCs);
- Improper waste management, leading to contamination from construction waste, hazardous waste, or general refuse;
- Localised ground contamination from vehicle tracking, parking, and plant maintenance activities; and
- Pollution from welfare facilities, such as leaks from temporary drainage, effluent tanks, or foul drainage systems.

M.i.10 Cross-Contamination from Vehicle Movements:

- Tracking of mud or contaminated soils from excavations to clean areas or public highways;
- Spread of contaminants caught in tyre treads or undercarriages;
- Transfer of spills from one working area to another, increasing the likelihood of wider contamination; and
- This risk is particularly relevant where haul routes intersect public roads or environmentally sensitive areas.

Assessment Conclusion

- M.i.11 Having regard to the scale, duration, and nature of the CEMP Works, and subject to the implementation of the controls set out in **Section N**, the CEMP Works are not expected to give rise to a relevant contamination risk in areas confirmed as Green / no or low contamination risk.
- M.i.12 In Pink Areas, and in any area where unexpected contamination is encountered, there is potential for a relevant contamination risk to arise unless the precautionary controls in this CEMP are applied and, where relevant, the requirements of Condition 14 are satisfied before non-preliminary work proceeds.
- M.i.13 Accordingly, where any part of the CEMP Land falls within an area for which the relevant requirements of Condition 14 are engaged, no work other than preliminary work will proceed in that area unless and until those relevant Condition 14 requirements have been satisfied.

N. CONTAMINATION PREVENTION AND CONTROL

Introduction

All CEMP Works will be undertaken in accordance with legislation and the following EA Pollution Prevention Guidance (PPG). Although these documents have been withdrawn, they continue to represent best practice guidance in contamination prevention and control, and remain publicly available for reference:

- PPG 1: General Guide to the Prevention of Pollution of Water Resources (EA, reviewed July 2013);
- PPG 2: Choosing and using Storage Tanks (EA, April 2014);
- PPG 3: Choosing and using Oil Separators (EA, 2006);
- PPG 6: Working at Construction and Demolition Sites (EA, April 2014);
- PPG 7: Operating Refuelling Facilities (EA, August 2011);
- PPG 13: Vehicle Washing and Cleaning (EA, July 2007);
- PPG 21: Pollution Incident Response Planning (EA, 2004); and
- PPG 22: Dealing with Spills (EA, April 2011).

The CEMP Works pollution control procedures provided in **Section N.i.1** have been prepared in line with the above guidance. Appropriate training on the guidance will be given to all CEMP Staff.

Precautions will be undertaken during the CEMP Period to protect the CEMP Land drainage system from siltation or pollution.

The controls in this Section will be applied proportionately to the specific activities, locations, and receptors relevant to the CEMP Works, and will be supplemented by task-specific risk assessments and method statements where higher-risk activities are planned.

Land Contamination Statement Notice

A Land Contamination Statement Notice has been prepared by [REDACTED] who is the Suitably Qualified Contaminated Land Practitioner for this submission to support discharge Planning Condition 14(6) of The Town and Country Planning (Entertainment Resort Complex, Bedford) Special Development (No. 2) Order 2025 for specific areas of the Order land.

The statement concludes that: Interpretation of the ground investigation data and a review of the historical mapping has identified that the areas coloured Green on the Land Remediation Location Plan – Areas of No or Low Levels of Contamination, shown in **Figure N-1** below, represent a low risk to future site users, adjacent properties, and controlled waters. In addition, the lakes on the Order land can be retained without requiring modification.

The signed technical note supporting this interpretation, the ground investigation results, and Generic Quantitative Risk Assessment, are available on request.

Detailed Remediation Scheme (availability and application)

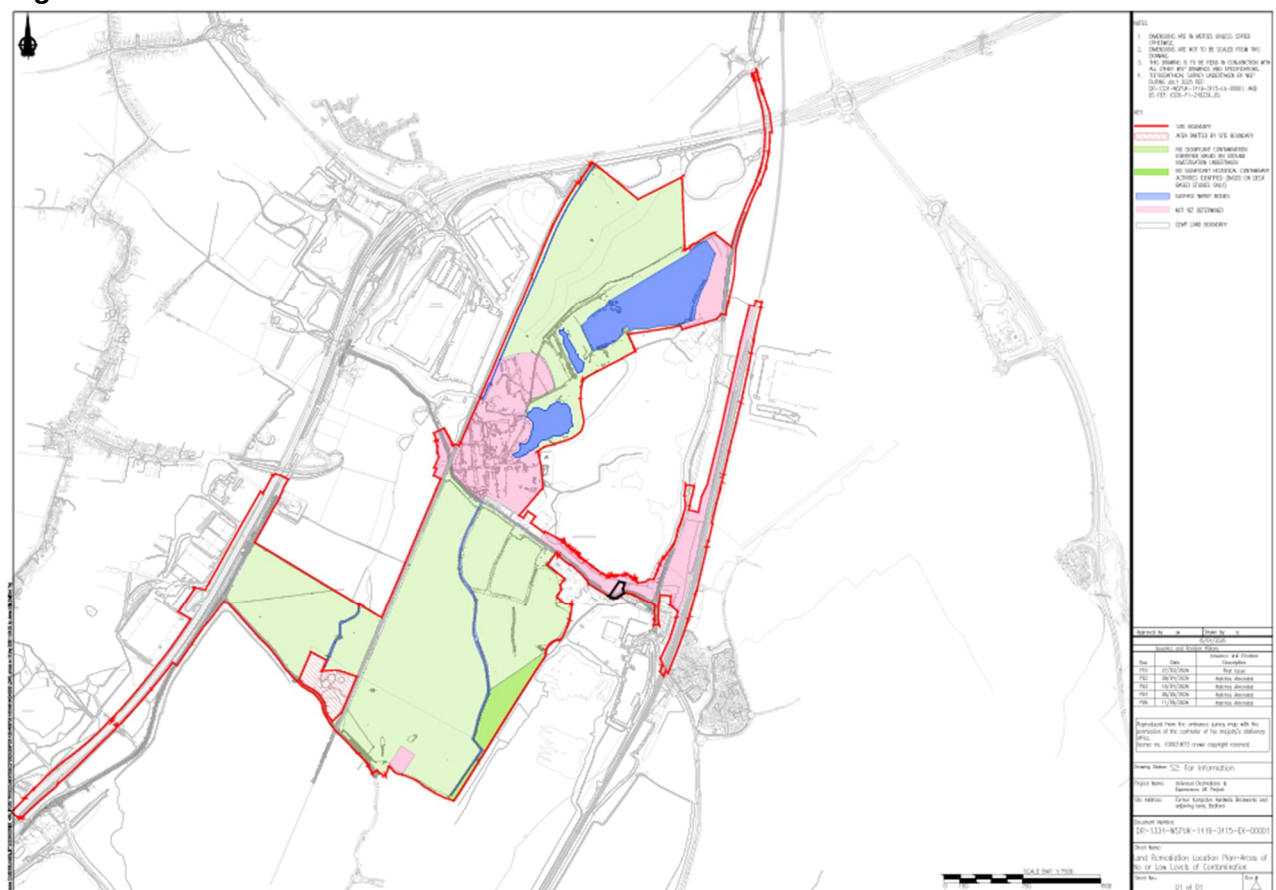
The controls set out in **Section N** apply to the CEMP Works and are to be implemented on a risk-based basis. Where CEMP Works are proposed in areas requiring remediation measures (e.g. Orange Areas and, where applicable, Pink Areas), the Site Controller will ensure that the relevant remediation measures are progressed in accordance with the detailed remediation scheme prepared under Condition 14 of the Order (where triggered) prior to works proceeding in those areas.

The detailed remediation scheme (including supporting plans, methodology, verification approach, and any required longer-term monitoring/contingency provisions) is available on request.

Where a detailed remediation scheme has been implemented, the Site Controller will notify the Secretary of State of the scheme measures undertaken and their completion and will provide a verification report by a suitably qualified contaminated land practitioner.

Where any part of the CEMP Land falls within a Pink Area or Orange Area (as shown in **Figure N-1**) and the relevant requirements of Condition 14 are engaged for that area, no work other than preliminary work will be permitted in that area unless and until the relevant Condition 14 requirements have been satisfied.

Figure N-1 - Contamination on CEMP Land



i. Procedures for Dealing with Contaminated Soils Encountered on, and their Removal from, the CEMP Land (Procedure)

- N.i.1 All waste leaving the Order land must be transported by a registered waste carrier, accompanied by a Waste Transfer Note (WTN) or Hazardous Waste Consignment Note, which must be retained for the required statutory period.
- N.i.2 Additional measures to protect ground and soils include:
- All CEMP Staff will be made aware of potential contamination issues on the CEMP Land as identified in **Section M: Assessment of Potential Risk from CEMP Works**;
 - Exposure to potential contamination for CEMP Staff will be mitigated through normal working practice using appropriate RAMS and use of standard PPE and hygiene best practice guidance at all times during the CEMP Works. Where contamination is suspected, CEMP Staff will be provided with appropriate PPE or respiratory protective equipment (over and above the standard PPE) where specified by the RAMS to prevent direct contact, ingestion or inhalation of potential soil or groundwater contamination;
 - Appropriate CEMP Land hygiene facilities will be put in place and the presence of contaminants, and the associated risks will be explained to CEMP Staff undertaking groundworks before they begin CEMP Works;
 - Unexploded ordnance (UXO) awareness briefing for all CEMP Staff involved with below ground excavations to be undertaken where necessary;
 - Construction vehicles and plant will be regularly maintained and supplied with spill kits;
 - Provision of spill containment equipment such as absorbent material available within the CEMP Land;
 - Hazardous materials already present within the CEMP Land or proposed to be used during the CEMP Works will be identified and an appropriate Control of Substances Hazardous to Health (COSHH) Assessment carried out;
 - Compliance will be ensured with relevant legislation, technical guidance and regulations in the identification, handling, storage, recovery, and disposal of waste. Provision will be made for a suitably qualified consultant to identify “hazardous waste” so that materials can be appropriately managed and disposed of during CEMP Works (refer to **Table P-1**).
 - Disposal sites and routes will be identified with the support of the Central Site Manager in engagement with the Environment Agency. Consideration will be given to transportation modes and alternatives to reduce the adverse environmental effects, times, landfill capacity, and license conditions;
 - Compliance will be ensured with all relevant legislation and regulations when dealing with contaminated materials;
 - It is anticipated that some excavations may encounter groundwater (perched or otherwise).
 - Water ingress arising from excavations will be managed through dewatering, treatment, and/or removal under an appropriate duty of care and/or consenting route, ensuring that contaminated water does not enter groundwater, surface water drains or any watercourse.

- Measures will be taken to ensure that, when emptying and/or excavating such structures, contaminated liquids do not contaminate the surrounding soil or other materials, or enter groundwater or any surface water feature (see **Paragraph N.ii.4** for measures to protect waterbodies from contamination).

N.i.3 Contamination prevention and control under this CEMP shall be implemented on a risk-based basis, aligned with the Land Remediation Location Plan shown in **Figure N-1**, and the detailed remediation scheme (available on request).

N.i.4 The CEMP Land is categorised into:

- Green Areas – no contamination risks requiring remediation, subject to standard controls and unexpected contamination procedures;
- Pink Areas – further investigation ongoing and precautionary controls required; and
- Orange Areas – remediation measures required prior to or during CEMP Works.

N.i.5 Further investigation and targeted testing in Pink Areas will be completed prior to the commencement of CEMP Works within those areas. Subject to satisfactory results, it is anticipated these areas will be reclassified as Green. Until such reclassification is confirmed, all activities in Pink Areas will follow the precautionary protocols, controls and pathways set out in the detailed remediation scheme (available on request).

All CEMP Works shall be undertaken in accordance with the applicable controls defined for each zone.

- Green Areas Control Approach – Standard good practice + unexpected contamination procedure;
- Pink Areas Control Approach – Precautionary controls, targeted testing, and supervised excavation until reclassified;
- Orange Areas Control Approach – Works only in accordance with the detailed remediation scheme (available on request).

N.i.6 There are contamination risks that are expected to arise from the CEMP Works in the CEMP Land, as shown in , the following precautionary measures must be employed:

- Excavations works in pink and orange areas to be overseen by suitably qualified geoenvironmental engineering specialist as outlined in **Table P-1**, or a designated individual;
- If previously unidentified contamination is discovered during the CEMP Works, the following must be employed:
 - Stop excavation works in that area of the CEMP Land;
 - Suitably qualified geoenvironmental specialist to assess the material, initially by visual and olfactory assessment;
 - Samples of the material shall be collected and sent to an appropriately United Kingdom Accreditation Service (UKAS) and Monitoring Certification Scheme (MCERTS) accredited laboratory for analysis. The suite of analysis shall be suitable for the suspected contaminants of concern, determined by the suitably qualified geoenvironmental engineering specialist;

- The suitably qualified geoenvironmental engineering specialist will assess the risks presented by the encountered material in the context of the CEMP Land and in accordance with best practice guidance to ensure material does not pose a risk to Human Health, Controlled Waters, or the Environment;
- Where remediation is necessary, this must be undertaken in relation to the intended use of the land after the CEMP Works;
- A survey shall be completed of all contaminated material excavated, along with detailed material tracking;
- On completion of the contaminated material excavation, verification sampling should be completed in accordance with best practice guidance to be agreed with the suitably qualified geoenvironmental engineering specialist;
- All findings, records, and laboratory reports to be recorded; and
- Material excavated can be re-used under appropriate duty of care subject to chemical testing to ensure the deposited material does not pose a risk to Human Health, Controlled Waters, or the Environment.

In case of CEMP Works within (or in immediate vicinity) of historical contaminated land, material excavated during CEMP Works must be chemically treated prior to deposit from CEMP Land as a waste and sent to an appropriately licensed facility.

If asbestos is identified during the CEMP Works, this material will require careful management in accordance with Industry Standard Procedures and Regulations. Asbestos exposure risk assessment and mitigation such as (but not limited to) dust suppression and air monitoring will be required.

If suspected Asbestos Containing Material (ACM) is identified, then the following is required:

- Stop works in the vicinity of the suspected location;
- Inform Central Site Manager and inform the suitably qualified geoenvironmental engineering specialist;
- CEMP Staff to be provided with appropriate PPE;
- Damp and cover the location to prevent release of asbestos fibres;
- Fence off the area to prevent tracking of fibres across the CEMP Land by vehicle/people movements;
- Collection of soil sample by the Contractor for asbestos quantification testing; and
- Removal of material from CEMP Land to an appropriately licensed facility.

Any imported material must be subject to chemical testing to ensure the material does not pose a risk to Human Health, Controlled Waters, or the Environment.

ii Prevention of Contamination of Watercourses (Procedure)

- N.ii.1 In addition to the EA PPG guidance, location-specific surface water and flood response arrangements are set out in **Section L: Management of Surface Water**, and any contamination-

risk-related additional controls will be implemented in accordance with the detailed remediation scheme (available on request) and relevant method statements.

- N.ii.2 This section supplements **Section L** and sets out the pollution prevention controls that apply to water receptors relevant to the CEMP Works. For the purposes of this section, references to watercourses or water receptors include surface water drains, drainage ditches, outfalls, and other surface water drainage features where present. The temporary runoff, dewatering, wheel-cleaning and refuelling controls described in **Section L.i**, **Section L.iii**, **Section L.iv**, **Section N.iii** and **Section N.iv** will be selected, implemented, and maintained so that untreated, sediment-laden, or contaminated water does not enter unmade ground, surface water drains or watercourses.
- N.ii.3 Watercourse protection – enhanced controls:
- Measures in this section are focused on preventing silt laden or contaminated runoff, and fuel/chemical pollution impacts to watercourses, surface water features, and drainage networks during the CEMP Works.
 - For the CEMP Works, the volumes of surface water generated are expected to be minimal (refer to **Section L.i.1**). Accordingly, the temporary runoff interception / treatment measures set out in **Section L.i** (Temporary Structures), **Section L.iv** (Works Near Water Bodies or Watercourses), **Section N.iii** (Managing Wheel Cleaning Facilities) and **Section N.iv** (Containment Structures and Systems for Refuelling of Construction Plant) are proportionate to the scale and risk profile of the CEMP Works.
 - Controls will be applied proportionately to risk, with increased supervision and inspection frequency during higher risk activities (e.g. dewatering, stockpiling near drainage pathways, refuelling/plant maintenance, and wheel washing).
 - No concrete or cement mixing, pouring, grouting, washout or washdown activities form part of the CEMP Works. Accordingly, concrete and cement washout/washdown arrangements are not applicable to this CEMP. If this changes, the CEMP will be updated under document control before such activities commence.
- N.ii.4 Other measures to protect watercourses include, but are not limited to:
- Spill kits to be stored at selected locations and CEMP Staff to be trained in their use;
 - Emergency response plans will be prepared prior to CEMP Works and reviewed/updated subject to CEMP Land conditions, where relevant;
 - Ensure stockpiled material is located at least 10m away from overland flow paths, watercourses, and drainage networks;
 - All machinery will be regularly checked for oil leaks or similar, which, if found, must be prevented from entering the drainage ditches or watercourses either through immediate repair of the machinery or through use of a drip tray/spill kit or similar;
 - Local weather forecasts will be monitored and works scheduled accordingly; and
 - Control and treatment measures will be inspected weekly by the Environmental Clerk of Works (EnvCoW) or a delegate to ensure they are working effectively.

iii Managing Wheel Cleaning Facilities (Procedure)

- Wheel cleaning will be undertaken on all vehicles leaving the CEMP Land, and will be in operation for the entire CEMP Period; Wheel cleaning will be undertaken only on clearly demarcated, impermeable hardstanding within a contained area, designed to prevent runoff entering unmade/porous ground or surface water drainage systems; runoff will be directed to a contained collection point within the wheel wash arrangement for settlement/filtration and reuse or controlled removal;
- The wheel cleaning system will also include rumble grids to dislodge accumulated dust and mud prior to leaving the CEMP Land where reasonably practicable;
- An area of hard surfaced road between the wheel cleaning facility and the CEMP Land exit will be provided;
- Wheel cleaning must be located at least 10m from existing watercourses or surface water drains; and
- Wheel cleaning will be supported by temporary SuDS (e.g. drainage blankets, land drains, and gravel traps) to prevent sediment-loaded water entering the proposed finished or existing water networks.
- Wheel wash water will be contained within the wheel cleaning system and, where practicable, settled / filtered and reused. Any temporary drainage or SuDS features associated with wheel cleaning will be used to provide interception, settlement, and additional treatment / polishing of for any controlled overflow or residual runoff (where required), and will not be relied upon as a standalone recycling unit.

iv Containment Structures and Systems for Refuelling of Construction Plant (Procedure and Plan)

- All plant will be refuelled in specified areas where there is non-permeable hardstanding with separate drainage systems, which will pass through an oil interceptor and then to a sealed containment sump/holding tank for removal by a licensed waste carrier; no drainage from refuelling areas will be discharged to ground, surface water drains, or any watercourses. Refuelling/storage areas will be laid out so that any spill or runoff is contained within the refuelling area and cannot enter surface water drainage systems;
- The contents of the oil interceptor and sealed sump/holding tank (including accumulated water, separated oils, and any captured debris/silt) will be managed as waste and removed by an appropriately authorised contractor to a suitably permitted facility; no discharge from refuelling areas will be made to ground, surface water drains or watercourses;
- Fuel will be stored in secondary containment and located a minimum of 10m from any watercourse. The secondary containment system will provide storage of at least 110% of the tank's maximum capacity and ensure that any valves, filters, sight gauges, vent pipes, or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges are contained;
- Drip trays will be installed to collect leaks from diesel pumps;

- Refuelling equipment will be regularly inspected, and any maintenance or repairs will be carried out immediately;
- All refuelling will be supervised by a suitably qualified operative and supplied with appropriate spill kits;
- Refuelling and fuel deliveries/unloading will be supervised by a competent person in accordance with task-specific RAMS, with pre-use checks of hoses/couplings/valves and use of drip trays/absorbents where appropriate to manage minor leaks;
- Where leaks are identified (e.g. staining, drips, damaged hoses, or fittings), refuelling/delivery will stop, the leak will be contained and cleaned up using spill response equipment, and defective equipment will be isolated and repaired/replaced before refuelling resumes; and
- Any refuelling-related spill or pollution incident will be managed under the CEMP incident response arrangements (**Section C-ii**), and refuelling area liquids/oils will not be discharged to foul sewer or drainage connections outside CEMP Land.

O. NATURAL ENVIRONMENT

General CEMP Land Management

General environmental protection measures will be implemented during the CEMP Period. Such measures include best environmental practice guidance outlined in the Government's Pollution Prevention for businesses. These are referred to in **Section N: Contamination Prevention and Control**.

The following minimum standards must be adhered to, to minimise negative ecological effects beyond the CEMP Land boundary:

- An Ecological Clerk of Works (ECoW) has been appointed to provide an advisory role throughout the CEMP Period. The competence requirements and evidence of qualifications/experience for the ECoW (and other specialist roles) are set out in **Section P: Roles and Responsibilities** and **Table P-1**, and credentials have been verified prior to appointment;
- Protection measures for Specified Habitats will be proportionate to the sensitivity of the relevant habitat and the nature of the nearby CEMP Works and will include, as a minimum:
 - Demarcation and access control: Specified Habitat boundaries (and any required buffers) will be clearly demarcated on the ground using fencing/pegs/signage, and CEMP Staff will be briefed on "no-go" areas through induction and task briefings;
 - No storage/plant/waste within protected areas: No stockpiling, plant parking/maintenance, refuelling, wheel washing, waste storage or uncontrolled runoff discharge will take place within demarcated Specified Habitat areas or their defined buffers;
 - Dust controls near habitats: Dust controls will be implemented (including damping down, speed control, screening, and the exceedance protocol) where works have potential to affect Specified Habitats;
 - Surface water and pollution prevention: Runoff and pollution prevention controls will be implemented in accordance with **Section L: Management of Surface Water** and **Section N: Contamination Prevention and Control**, including maintaining stand-offs for higher-risk activities and protecting water receptors and surface water drainage features/outfalls where present;
 - Lighting controls (where relevant): Temporary lighting will be managed in accordance with **Section J: Construction Lighting Management**, including dark corridor lux limits where applicable, to avoid light spill impacts to sensitive habitats/species; and
 - Monitoring and assurance: Habitat protection measures will be checked as part of routine environmental inspections and ecological monitoring set out in **Table O-1**, with corrective actions implemented where non-conformance is identified.
- Excavations will be covered overnight or otherwise protected to prevent animals falling in. Open pits, open pipes, and other excavations will be covered at the end of the day to prevent mammals being trapped. Excavations are to be checked first thing each morning, prior to the start of CEMP Works that day. Any animals found within excavations will be allowed to escape and move off, or be carefully removed and placed within suitable habitat cover before CEMP Works recommence;

- Appropriate protective fencing and signage will be installed around retained habitats during CEMP Works. This may include the use of solid hoardings, to reduce visual and noise effects from construction activities;
- Vegetation clearance is not part of the CEMP Works. All ecological control measures related to clearance are omitted from this CEMP; and
- All safeguards outlined above will be implemented prior to the start of CEMP Works and will remain in place until the end of the CEMP Period.

i Management Invasive Non-native Species (Procedure)

- O.i.1 Due to the limited scale and duration of the CEMP Works, no significant impacts on invasive non-native species are anticipated.
- O.i.2 As a precaution, the following pre-demolition checks will be carried out to manage the risk of spreading invasive non-native plant and animal species:
- An ECoW has been appointed to oversee the invasive non-native species management;
 - Prior to the commencement of the CEMP Works, an invasive non-native species (INNS) check will be undertaken by an ECoW;
 - Following the surveys, exclusion zones will be established around identified areas of invasive species; and
 - Defra's "Check, Clean, Dry" principles will be followed such that all PPE and survey equipment is clean and dry (and if necessary, disinfected) if required prior to going to and from an area with known invasive species.

ii Management Measures for Protected Species and Habitats (Procedure)

- O.ii.1 The following measures will be followed during the CEMP Period:

Pre-Commencement Surveys

- O.ii.2 Pre-commencement surveys/checks relevant to the CEMP Works will be undertaken by the ECoW or an appropriately qualified and experienced delegate appointed by the ECoW. Before any CEMP Works (including vegetation removal) commence in the relevant area, the ECoW or delegate will complete a written check-off confirming either:
- That no protected species/active nests/relevant habitats are present that would prevent the CEMP Works proceeding; or
 - That the necessary exclusions, controls, supervision, and/or licences are in place.
- The written check-off record will be retained on the CEMP Land for audit/compliance purposes.
- O.ii.3 Where pre-commencement surveys identify protected species or habitats such that works cannot proceed under the existing endorsed controls, or where additional licensing, exclusion measures or a material change to the CEMP measures is required, the Site Controller will notify MHCLG before works commence in the affected area; such notification will include the location/extent relevant to the CEMP Works area and the specific protection/mitigation measures to be implemented.

Bats

- O.ii.4 A European Protected Species Mitigation License (EPSML) has been granted by Natural England which stipulates management and monitoring measures for licensed activities for the Authorised Development. The CEMP Works will be undertaken in accordance with the EPSML management and monitoring procedures.

Monitoring

- O.ii.5 **Table O-1** sets out the minimum monitoring frequencies for ecological mitigation measures during the CEMP Period. Monitoring frequency is risk-based and may be increased where CEMP Works proximity/sensitivity or inspection findings indicate this is necessary.
- O.ii.6 Monitoring records (including inspection logs, ECoW/EnvCoW records and relevant survey outputs) will be maintained under document control and will be available on the CEMP Land for audit/compliance checks.

Table O-1 – Monitoring of Ecological Mitigation Measures during the CEMP Period

Feature	Construction Monitoring
Bats	Measures to align with the monitoring strategy as part of any EPSML. Pre-demolition check of tree protection fences by the Named Ecologist, accredited agent, or an appropriate person, appointed by the Named Ecologist.
Additional Species of Principal Importance and animal welfare considerations	Pre-demolition check for presence of any other species of interest in proximity to the CEMP Works.

iii Vegetation Retention and Removal Plan (Plan)

- O.iii.1 This section is omitted because there is no vegetation clearance planned as part of the CEMP Works.

iv Management Measures for Trees, Hedgerows and Retained Habitats (Standard)

- O.iv.1 No additional vegetation is to be removed as part of the CEMP Works. Vegetation removal took place to enable preliminary works.

The location of compounds, access/haul routes, storage areas and protected/retained environmental features (including demarcation/exclusion zones relevant to this CEMP) are shown on the relevant **Appendix B** layout plans, including **Appendix B(1) – Vine Cottages Compound Layout**; **Appendix B(2) - Manor Road Compound (Lake Zone)**; and **Appendix B(3) – Manor Road Materials Laydown Area**.

P. ROLES AND RESPONSIBILITIES (POLICY)

- P.i.1 Personnel with defined environmental responsibilities during the CEMP Period are identified in line with **Table P-1**. All defined appointments are in place.
- P.i.2 For each role, appropriate competence criteria have been defined, including relevant qualifications, experience, task specific skills, and any required authorisations. Prior to appointment, credentials, and suitability have been verified.
- P.i.3 All appointed specialists have been inducted on the CEMP Scope, CEMP Land constraints, key control plans, and escalation procedures, and deputy arrangements have been established.
- P.i.4 Where changes to appointed specialist personnel are required, replacements will be subject to the same or higher competence checks and a structured handover will be completed to ensure coverage is always maintained.
- P.i.5 The Site Controller and Contractor will appoint and retain persons with suitable qualifications and experience to carry out, or advise on, specialist matters through a proportionate procedure that includes:
- Defining role-specific competence requirements (qualifications, professional memberships, and relevant experience);
 - Credential and competency verification prior to appointment;
 - Induction on CEMP scope, CEMP Land constraints, control plans, and escalation arrangements;
 - Maintaining deputy/cover arrangements to ensure continuity; and
 - Managing personnel changes under document control with competence re-checks and a structured handover. Records of appointments, competence evidence and briefings will be retained and made available for audit/compliance checks.
- P.i.6 These arrangements are supported by access to organisations and specialist supply chains with sufficient depth and breadth to provide, retain and, where necessary, replace appropriately qualified personnel without loss of competence or continuity.

Table P-1 - Personnel with Defined Environmental Responsibilities

Role	Role Description Relevant to this CEMP
Assessment and prevention of relevant contamination risks and other risks of environmental pollution	Member of Royal Society of Chemistry or Chartered Institution of Water and Environmental Management with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and

Role	Role Description Relevant to this CEMP
	Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Monitoring noise and vibration	Member of Institute of Acoustics with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Monitoring dust and other emissions to air	Member of Institute of Air Quality Management with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Contractor	Monitoring (noise and vibration, dust, and other emissions) and ensuring that the CEMP Works proceeds in accordance with all relevant environmental construction mitigation measures; including water quality, sediment monitoring, and geo-environmental engineering aspects; and Reviewing and inputting into risk assessments, including contamination risks and environmental processes and management systems.
Environmental Clerk of Works (EnvCoW)	Technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and

Role	Role Description Relevant to this CEMP
	Has a thorough understanding of incident escalation processes in accordance with best practice, including appropriate stakeholder engagement.
Ecological Clerk of Works (ECoW)	Technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Arboriculture Clerk of Works (ArbCoW)	Member of Arboricultural Association accredited body with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Health and safety	Member of Institution of Occupational Safety and Health with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Named Ecologist	Member of Chartered Institute of Ecology and Environmental Management accredited body with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history;

Role	Role Description Relevant to this CEMP
	Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement; and Holds any relevant protected species licences (e.g. for badgers, bats or other species as required) and is the named licence ecologist or accredited agent where applicable.
Geoenvironmental Engineering Advisor	Member of Institution of Civil Engineers with sufficient technical experience across projects of a similar scale and complexity; Deep understanding of the CEMP Land as well as Authorised Development background and history; Experience managing people in this technical discipline; Extensive experience in monitoring, reporting, and raising incidents; and Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.

Q. CONSTRUCTION TRAFFIC MANAGEMENT

Roles and Responsibilities

- Q.i.1 This section sets out the Construction Traffic Management Plan (CTMP) for the CEMP Works, and sets out the requirements for access arrangements, routing, delivery management, monitoring, and governance.
- Q.i.2 This CTMP sets out the approved access/egress routes, controls for vehicle movements, and measures to minimise traffic-related nuisance to nearby sensitive receptors and support proportionate sustainable travel behaviours for CEMP Staff. These arrangements apply to traffic generated by the CEMP Works and will be implemented through the CLP and Transport Coordinator governance arrangements.
- Q.i.3 Traffic movements associated with the CEMP Works will be planned and managed to minimise nuisance to neighbouring residents and businesses, with communications and complaints managed in accordance with **Section C: Engagement with Neighbouring Residents**.

i. Access Points from Public Roads (Plan)

- Q.i.4 Construction Site access arrangements, including primary, secondary, temporary, and alternative access points, are to be in accordance with **Section Q-ii** below.

ii Regulation of Vehicle Movements to and from the CEMP Land (Procedure)

ORGANISED (DELIVERY PLANNING AND BOOKING)

General Construction Related Delivery Management (Procedure)

- Q.ii.1 An Authorised Development-wide web based DMS will be procured, implemented, and managed by the CLP for the purpose of scheduling deliveries and ensuring arrivals are accepted in a controlled manner thus mitigating the impact of congestion to the local roads.
- Q.ii.2 All deliveries intended for the CEMP Land will be required to be booked in through the DMS at least 48 hours in advance and traffic management will be supervised by the CLP. Abnormal loads will require a minimum of seven days' notice.
- Q.ii.3 The CLP is responsible for the allocation, operation, and administration of the DMS across the Order land, including allocation of booking capacity and access windows between the different CEMP work packages and contractors. For the CEMP Works, the Contractor and Transport Coordinator will operate within that Order-land-wide DMS allocation and governance framework.

SUPERVISED (SITE CONTROL AND GATEKEEPING)

- Q.ii.4 All deliveries will be required to visit the Logistics Hub (CA1) where their arrival will be checked against the daily delivery schedule. Drivers will be held there within a Lorry Holding Area (LHA) until they are authorised to proceed to their delivery destination. Construction Logistics and Community Safety (CLOCS) checks will also be carried out at this location.

CONTROLLED (ROUTING, CAPS AND COMPLIANCE CONTROLS)

- Q.ii.5 All deliveries will be required to follow predetermined routes to the CEMP Land avoiding restricted areas, routes and, where possible, local roads as shown in **Figure Q-1**.
- Q.ii.6 Delivery data will be collected for the purpose of SDO reporting.
- Q.ii.7 Prior to the commencement of CEMP Works, measures will be implemented to deter parking CEMP Works-associated parking outside the CEMP Land. This will include clear communication and signage at access/egress points to the CEMP Land, and within workforce parking areas. Where additional signage outside the CEMP Land is considered necessary (e.g. at nearby laybys or sensitive locations), this will be installed only with the agreement of the relevant highway authority/landowner and at locations/designs to be confirmed through the CTMP governance arrangements.

Delivery Routes

- Q.ii.8 Within the DMS booking process each booking will be presented with a Route Map advising which routes have been agreed for the arrival and dispersal of Heavy Duty Vehicles (HDVs).
- Q.ii.9 The routing phasing is as follows:
 - Route via Ampthill Road (to access East Gateway Zone), via Ampthill Road and Manor Road East (to access Lake Zone) and Broadmead Road (via Woburn Road to access West Gateway and Core Zone) in the initial phases;
- Q.ii.10 Delivery routing will be controlled through the CLP DMS and driver instructions. Commercial vehicles (including HDVs and LGVs) will be directed to enter and leave the CEMP Land in accordance with the delivery routing set out above, except in abnormal or emergency circumstances.
- Q.ii.11 The Village of Stewartby and the western section of Manor Road will be avoided due to weight restrictions and local agreements. These areas are shown in red hatching in **Figure Q-1** below.

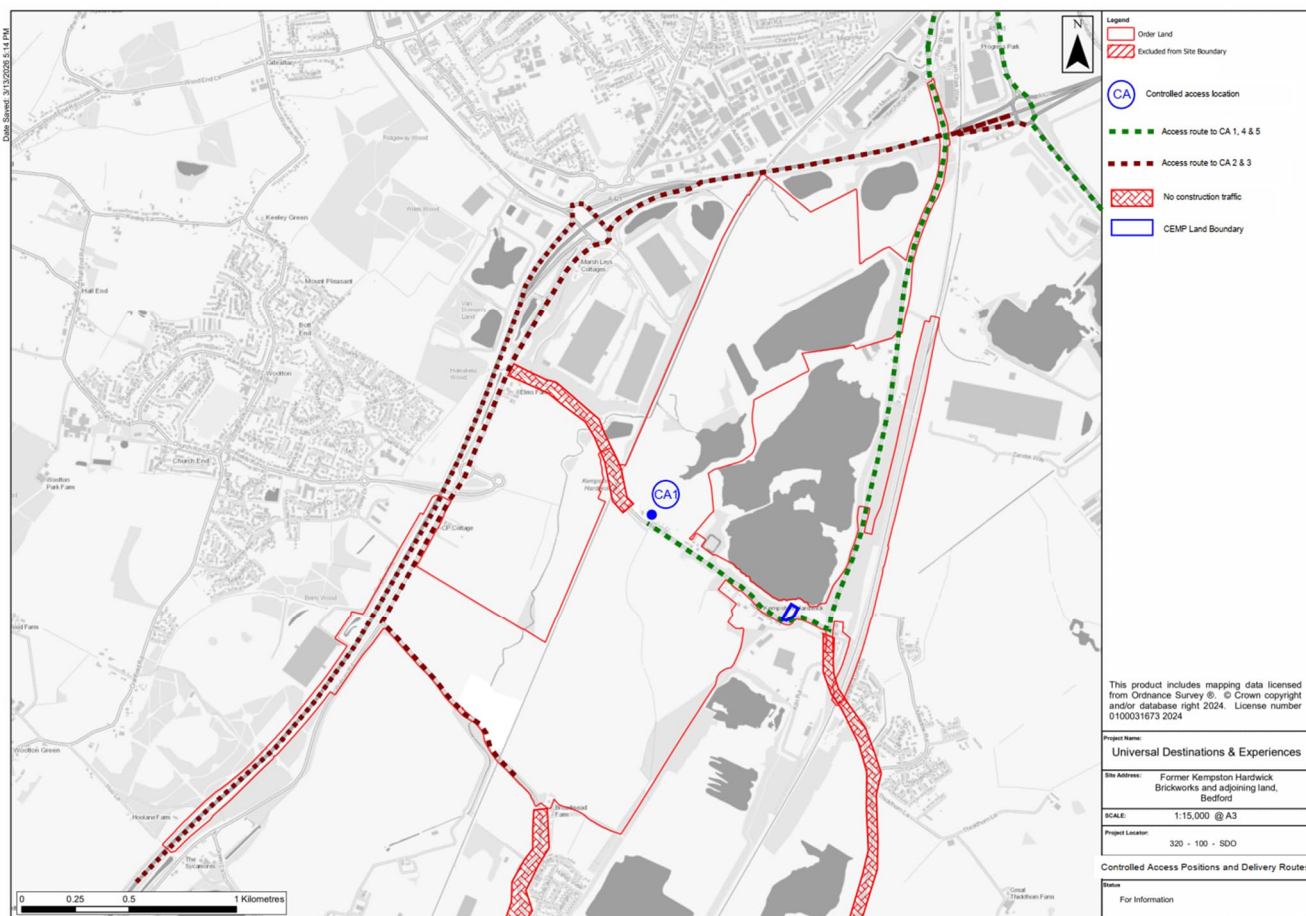


Figure Q-1: Access Arrangements for the CEMP Works

Local constraints – Manor Road bridge restriction

- Q.ii.12 A weight restriction applies to a bridge structure on Manor Road. Accordingly, vehicles exceeding the applicable restriction will be routed using the approved alternative route(s) shown on **Figure Q-1** and controlled through the CLP DMS.

MONITORED (RECORDING, REPORTING AND REVIEW)

Monitoring Report

- Q.ii.13 The DMS will be monitored on a daily basis against the actual HDV deliveries and if there is a breach of the HDV upper limits, the Contractor via their TCs will notify the CTMG as part of the reporting procedure. Daily monitoring will help to ensure that any issues are identified at an early stage and dealt with promptly.
- Q.ii.14 In addition to notifying the CTMG of any breaches, every three months the Contractor via their TCs will prepare a monitoring report and submit it to the CTMG for review. The reports will include the following for the previous period:
- Record of DMS bookings;
 - Comparison of DMS bookings against HDV deliveries;

- Comparison of HDV deliveries against HDV limits;
- Monitoring data; and
- Details of any breaches of HDV limits including a report on movements that have been identified as fulfilling the exceptional circumstances criteria. Criteria include emergency services attendance; road traffic collisions/incidents; unplanned highway restrictions or closures (including police or highway authority instructions) requiring diversion; severe weather or safety-critical events; vehicle breakdown/defect requiring recovery; and urgent safety or environmental response actions (e.g. spill response or making safe).

Review

- Q.ii.15 The review process for the measures and commitments detailed within this CTMP will be through the CTMG. Reviewing the results of the monitoring process is therefore essential to ensure that this CTMP delivers the required outcomes.
- Q.ii.16 The Contractor monitoring report will be provided at least three working days before the CTMG meeting.
- Q.ii.17 The CTMG will meet every month and will discuss the monitoring report and agree any refinements to this CTMP that are required to avoid repeat non-compliance. The following will be discussed at each CTMG meeting:
- Consider the performance and effectiveness of the freight management measures;
 - Discuss any required variations; and
 - Agree information that can be disseminated from the CTMG to other interested parties.
- Q.ii.18 For the purposes of this CTMP, 'interested parties' includes the Promoter, the CLP/Transport Coordinator, Bedford BC, other relevant route authorities (e.g. National Highways where applicable), and affected local stakeholders such as neighbouring residents and businesses, subject to data protection and commercial confidentiality requirements.

Compliance

- Q.ii.19 The Contractor will use internal management procedures to ensure compliance with the requirements. This will include:
- Kick Off Meetings;
 - Site Induction;
 - Driver's User Group;
 - TSG Learning Reports;
 - TSG Feedback Reports; and
 - Order land-wide logistic meetings coordinated through the CLP/Transport Coordinator to review forward delivery plans against the cumulative cap and agree any required adjustments.

Default Mechanisms

- Q.ii.20 Should the monitoring of this CTMP show that the SDO limits and/or CTMP measures are not being met, default mechanisms including notification regarding a breach to CTMG and issuance of a warning letter to relevant sub-contractors will be undertaken.
- Q.ii.21 The proposed stages of the default procedure are set out below:
- The Contractor will notify the CTMG of a breach of the HDV restrictions;
 - CTMG will issue a warning letter to Contractor. The Contractor will subsequently issue a warning letter to the relevant Sub-contractor(s) outlining what action would be taken in the event of a further breach; and
 - Meet with CTMG to report the details of the breach and the response, including any corrective actions.
- Q.ii.22 In the event that the Sub-contractor(s) breaches for a second time, then regardless of the time elapsed since the first breach, the Sub-contractor(s), in engagement with the Contractor, shall be required to submit a proposal for corrective action. The corrective action would need to be commensurate with the nature of the breach and agreed with the CTMG. If there are repeat instances of HDV drivers diverging from the HDV route the Contractor(s) will be required to replace the HDV driver responsible for the breach.

Document updates

- Q.ii.23 This CTMP section will be reviewed through the CLP/Transport Coordinator governance arrangements (including CTMG where applicable) and updated under document control where required. Where an update constitutes a modification to the endorsed CEMP, it will be progressed in accordance with the applicable endorsement/modification process.

Communication Strategy

- Q.ii.24 The CTMP will also form part of the induction for all CEMP Staff.
- Q.ii.25 CTMP information will be communicated by the TC to contractors, suppliers, hauliers, and drivers involved in the CEMP Works through appropriate channels (e.g. delivery booking instructions, driver briefings/inductions, and CEMP Land access information).

The key CTMP information will include, as a minimum:

- HDV movement limits and caps (including cumulative Order land-wide caps managed by the CLP/Transport Coordinator where applicable);
- Approved HDV routes and access gate information;
- DMS requirements, including booking arrangements;
- Default mechanisms and escalation steps for non-compliance;
- Approved locations for rest stops/parking/holding areas (where applicable) to avoid inappropriate waiting or routing;
- Contact information for the DMS manager/Transport Coordinator; and

- Instructions on what to do if a DMS slot cannot be met (including rescheduling and escalation arrangements).

HOLDING ARRANGEMENTS (VEHICLES PRIOR TO ARRIVAL)

Lorry Holding Area

- Q.ii.26 The relevant LHA, marshalling area or queuing area associated with the applicable construction access will be used to temporarily hold deliveries until they are called forward to the relevant delivery zone. Whilst within these controlled holding/marshalling arrangements, vehicles and drivers will be subject to the relevant checks (including CLOCS checks where applicable) and will be briefed on the procedures set out in this CEMP. Drivers will remain with their vehicles unless they are using the common user facilities, including WCs, smoking areas, or rest areas, established for the comfort and safety of LHA users.
- Q.ii.27 Vehicles held within the LHA will be subject to a proportionate visual check for obvious leaks, spillages or other conditions that could cause environmental pollution before being released to the wider CEMP Land. Any vehicle identified as leaking or otherwise presenting an environmental risk will not be permitted to proceed until the issue is addressed. The Contractor will also require suppliers and hauliers, through contractual/supply chain controls, to ensure vehicles attending the CEMP Works are roadworthy and do not present a risk of environmental pollution.

iii Details and Phasing of Routing for Vehicles Travelling to and from the CEMP Land (Procedure)

The routing phasing applies to all construction-related vehicle movements associated with the CEMP Works, including CEMP Staff vehicles, HDVs, AILs and vehicles removing spoil or waste, unless specific restrictions or routing instructions are identified through the CLP/Transport Coordinator governance arrangements for safety or operational reasons.

Construction Workers

The following management measures will be encouraged for how CEMP Staff will get to and from the CEMP Land during the CEMP Period:

- CEMP Staff will be encouraged to use public transport, cycle or vehicle sharing to and from CEMP Land;
- The Contractor's supply chain (such as their subcontractors) will be encouraged to minimise single-occupancy vehicle trips, including through car sharing, use of public transport where practicable, and local accommodation where appropriate. Where CEMP Staff numbers and programme allow, the Contractor will consider the introduction of managed pick-up points or shared transport arrangements for later stages of the CEMP Works; and
- Contractor's sub-contractors who may be working away from home will be encouraged to find accommodation locally to minimise travel and vehicles attending CEMP Land.

Abnormal Indivisible Loads (AILs)

- Q.iii.1 For any Abnormal Indivisible Loads (AILs), the Contractor will agree the routing strategy with Bedford BC and liaise with other relevant route stakeholders as required (e.g., police, National Highways, and affected route asset owners). Any required highway approvals/consents will be

obtained through the relevant process; MHCLG will be provided with summary information via CTMP reporting if requested.

- Q.iii.2 The Contractor will ensure all AIL movements will be coordinated with Stakeholders and keep to the roads identified depending on the size and weight of the vehicles in line with applicable legislation. National Highways (NH) has identified national routes that were considered suitable for heavy loads and classified them by weight capacity.
- Q.iii.3 AILs will be one-off deliveries and removals and will generally occur at times when construction activity is low (such as the start and end of the CEMP Works phase they are associated with). They will arrive on the CEMP Land and be removed from the CEMP Land at times which are set in engagement with stakeholders. These AIL movements may occur outside the permitted delivery times subject to engagement with stakeholders.
- Q.iii.4 It is anticipated that heavy plant will be delivered to the CEMP Land on low loader combinations, unescorted as the maximum width, length and weight are less than the requirements prescribed under best practice guidance and applicable legislation for police escort HDV and AIL Routes.
- Q.iii.5 The Contractor is responsible for ensuring that statutory notifications required for AIL movements are issued by the appointed haulier to the police and relevant highway and road/bridge authorities (typically a minimum of 2 clear days' notice, and longer where required depending on load characteristics and route). The CLP/Transport Coordinator will coordinate and administer the notification process ((including use of Electronic Service Delivery for Abnormal Loads (ESDAL) where appropriate) and no AIL movement will proceed unless the routing, timings, escorts, and notifications have been agreed through the CLP in consultation with The Promoter and confirmed as accepted/cleared by the relevant authorities.

HDV Routes

- Q.iii.6 The Contractor, its subcontractors and suppliers will comply with the approved HDV routing arrangements. Wherever practicable, HDVs will use the Strategic Road Network (SRN) - i.e. motorways and major A-roads managed by National Highways - for the main part of the journey, only leaving the SRN at the agreed junction(s) to follow the approved local access routes to the CEMP Land shown in **Figure Q-1**.

HDV Route Compliance

- Q.iii.7 An HDV route signage plan (including sign types, locations, and an installation schedule) will be prepared and implemented to support driver compliance with the approved HDV routes and to direct vehicles to the correct access/gate. Signage will be installed within the CEMP Land and, where necessary, at agreed locations on the wider approach route(s).
- Q.iii.8 Any signage proposed on the public highway, highway verge/footway, or on third-party land will be installed only with the agreement of the relevant highway authority and/or landowner, and in accordance with applicable requirements for signs placed on or near the highway.

The approved HDV routes will be communicated to all parties involved in transporting materials through these CTMP communication arrangements (e.g., delivery booking instructions, driver briefings/inductions, and route maps), and will be reinforced through wayfinding signage within the CEMP Land and (where agreed) outside the CEMP Land.

Vehicles Removing Spoil or Waste

- Q.iii.9 Arrangements for the removal of spoil or waste from the CEMP Land will follow the procedure noted in **Section I.ii**.
- Q.iii.10 Unless explicitly stated otherwise for a specific activity (e.g. an abnormal load movement requiring special routing/notifications), vehicles travelling to and from the CEMP Land in connection with the CEMP Works will follow the same approved route phasing and access arrangements set out in **Section Q-ii** and communicated through the DMS/driver briefings.

iv Management of Deliveries to the CEMP Land (Procedure)

Delivery Management System (DMS)

- Q.iv.1 All HDVs arriving at the CEMP Land will be required to book in advance via the DMS. HDVs without a valid booking will be refused entry to the CEMP Land.
- Q.iv.2 The DMS records will be used to monitor the HDV deliveries against the HDV limits set out in the following section.
- Q.iv.3 Un-booked deliveries will be managed within 3 scenarios:
1. CLP to engage with the sub-contractor responsible for the delivery to determine why the delivery arrived without a booking. Entry will be allowed if a reasonable reason is given and space is available within the CEMP Land. However, the delivery information will be required to be added to the DMS immediately for data capture;
 2. If there is insufficient space within the CEMP Land to receive a delivery, the vehicle will be directed to the designated LHA while the CLP/Transport Coordinator investigates and confirms when the delivery can proceed; and
 3. If no space is available within the CEMP Land or in the LHA, the delivery will be refused and asked to leave the Order land entirely. The delivery shall be booked for another time/day.
- Q.iv.4 Unbooked deliveries or vehicles arriving outside their allocated slot will not be processed at the site entrance on the public highway. Such vehicles will be directed away from the access point to the appropriate pre-defined holding or marshalling location associated with the relevant construction access shown in **Figure Q-1**, or instructed to leave and await re-booking through the DMS, in accordance with the CTMP and the instructions of the CLP/Transport Coordinator.

At Construction Access CA-1 (Manor Road into the Lake Zone), the existing marshalling/queuing and holding arrangements are established and operated by the CLP. The current marshalling/queuing area has capacity for up to three HDVs, ensuring that vehicles can queue without backing up onto Manor Road. Beyond the marshalling area there is a LHA, and an internal turning arrangement enabling vehicles to leave the site safely and efficiently back onto Manor Road.

At Construction Access CA-5 (Manor Road into the Core Zone), a dedicated queuing area with capacity for up to four HDVs will be provided within the Order land, ensuring that vehicles can queue without backing up onto Manor Road. These arrangements will be planned and coordinated through the CLP logistics strategy and implemented by the Contractor as part of the CEMP Works. Beyond the marshalling area there will be a LHA, together with an internal turning arrangement enabling vehicles to leave the Order land safely and efficiently back onto Manor Road.

At Construction Access CA-3 (Broadmead Road into the Core Zone), a larger LHA will be established to manage arrivals in coordination with the wider CLP arrangements. The location, capacity and operation of this holding area will be planned through the CLP logistics strategy and implemented by the Contractor as part of the CEMP Works.

- Q.iv.5 The operation of these queuing, marshalling, and holding areas will be governed through the CLP/Transport Coordinator, using real-time DMS information and local gate/marshalling supervision to monitor arrivals, occupancy, and call-forward to the relevant delivery point. An early warning trigger for intervention will apply where occupancy is approaching the available queuing or holding capacity at the relevant construction access such that further call-forward could create a risk of vehicles waiting, manoeuvring, or backing up towards the public highway. The action trigger for intervention will be when the available queuing or holding capacity at the relevant construction access has been reached, or where further call-forward of vehicles would create a risk of vehicles waiting, manoeuvring, or backing up onto the public highway.
- Q.iv.6 Where the early warning trigger is reached, the CLP/Transport Coordinator will moderate or suspend further call-forward to the relevant construction access, hold back vehicles not yet released through the DMS, and implement any additional marshalling/traffic management controls required to maintain safe operation and avoid highway impact. Where the action trigger is reached, no further vehicles will be processed into the relevant queuing/holding area until capacity becomes available. Vehicles not yet released through the DMS will be held back from travelling to the access point, and any vehicles arriving without a valid slot or instruction will be directed away from the access point and instructed to leave and await re-booking through the DMS. If required, the CLP/Transport Coordinator will resequence call-forward, temporarily suspend arrivals to the affected construction access, and implement additional traffic management/marshalling controls to maintain safe operation and avoid highway impact.
- Q.iv.7 Any instance where the action trigger is reached, or where there is a risk of queueing affecting the public highway, will be reported immediately through the CLP/Transport Coordinator governance arrangements to the CEMP Works Site Manager and Central Site Manager, and recorded as part of the CTMP monitoring and review process. Instances where the early warning trigger is reached repeatedly will also be reviewed through the CTMP monitoring and review process to determine whether further adjustments to call-forward, marshalling or holding arrangements are required.
- Q.iv.8 Repeat non-compliance by suppliers or hauliers may result in escalation through the CLP/Transport Coordinator procedures, including warning, re-briefing and removal of booking privileges where required.
- Q.iv.9 The DMS records will be used to monitor the HDV deliveries against the HDV limits set out in the following section.
- Q.iv.10 The DMS records form the basis of the regular monitoring report that will be provided as required by this CTMP, see section on Monitoring and Review in **Paragraphs Q.ii.13 to Q.ii.18.**

Capping of HDV Movements

- Q.iv.11 The Contractor and their Sub-contractor(s) will minimise HDV movements associated with the CEMP Works by consolidating loads, and optimising payloads, including:
- Optimising the specification for the imported materials; and

- Maximising HDV payload utilisation, where safe and practicable.

Q.iv.12 Until the delivery of the new Woburn Road Roundabout, the West Gateway Roads, and the new bridge over the Marston Vale Railway (and associated elements of Public Road A), the following traffic caps apply cumulatively across all CEMP Works and access points serving the Order land (i.e. they are not specific to this CEMP Works package):

A total cap of 500 HDV deliveries per day (1,000 two-way movements) to and from all Order land access points from the public highway (being the assessed level plus 10%); and

On Manor Road (east of the Marston Vale Railway Line), a cap of 3,035 passenger car unit (PCU) movements in total, based on the current (2023) baseline traffic level.

Q.iv.13 The CLP, acting through the Transport Coordinator(s), will manage these caps on a cumulative basis via the DMS. Each Contractor will be required to forward plan and book its deliveries so that total daily movements remain within the cumulative cap alongside other contractors' movements.

Q.iv.14 If monitoring indicates that the cumulative cap is at risk of being exceeded, the CLP/Transport Coordinator will implement the agreed default mechanisms, including restricting or rescheduling bookings, holding vehicles at designated holding areas (where applicable), and issuing corrective actions. Any exceedance (or near miss) will be recorded, reported to the CTMG, and subject to review and close-out actions to prevent recurrence.

Timing of Deliveries

Q.iv.15 HDV deliveries will occur during the permitted construction working hours as set out in **Section B: Construction Working Hours**. At all other times, no HDVs will be permitted to arrive or be dispatched from the CEMP Land, with the exception of necessary exclusions for AIL movements, or where exceptional circumstances are evidenced and authorised through these CTMP governance arrangements (Transport Coordinator/CLP), recorded in the CTMP log, and supported by contemporaneous evidence.

v Recording and Monitoring of Construction Traffic Movements (Method Statement)

Q.v.1 Recording and monitoring of construction traffic movements will be undertaken through DMS records, gate records and periodic checks as required to demonstrate compliance with the approved routes and caps. Measures for securing adherence to routing will include, as a minimum:

- DMS booking controls (refer to **Section Q.iv**);
- Route maps and routing instructions issued through the DMS booking process;
- Driver briefings/induction and reinforcement through signage/wayfinding (within the CEMP Land and, where agreed, on approach routes);
- Monitoring and reporting of breaches, as outlined in Paragraphs **Q.ii.13** to **Paragraph Q.ii.14** (including escalation through CTMG governance where applicable); and
- Default mechanisms/corrective actions for non-compliance (refer to **Paragraph Q.ii.20** to **Paragraph Q.ii.22**).

vi Travel Planning for Workers during Construction (Policy)

- Q.vi.1 Everyone wishing to gain access to the CEMP Land shall be obligated to complete an induction agreeing to the CEMP Land rules and providing information required to meet the requirements of the SDO.
- Q.vi.2 An element of this induction process includes the issuing of passes and granting access to specific areas of the CEMP Land so as to avoid queues of vehicles forming on public roads. The pre-enrolment stage of this process shall outline the expectations of CEMP Staff transportation and include measures for encouraging the reduction in private vehicle use.
- Q.vi.3 Measures to be considered include:
- Provision of shuttle busses from local and major transport hubs, park and rides, public car parks;
 - Use of existing park and ride facilities;
 - Cycle parking facilities will be provided within the CEMP Land at the relevant site compounds for use by CEMP Staff and are shown on the compound layout plans in **Appendix B**;
 - Utilisation of a car sharing digital application; and
 - Increased frequency or additional public transport services.
- Q.vi.4 Due in part to the minimal availability of public transport, it is anticipated that a substantial percentage of CEMP Staff will choose to drive personal or company vehicles. All these vehicles will therefore need to be registered at the point of induction.
- Q.vi.5 To ensure that reliable emission data can be captured, CEMP Staff will be requested to provide information on their typical journey, such as the postcode of their permanent or temporary accommodation. This information will be included in an Authorised Development dashboard as used as the SDO reporting mechanism.

Responsibilities of the Transport Coordinator

- Q.vi.6 The Transport Coordinator will have overarching responsibilities for promoting and supporting sustainable travel for the CEMP Staff, including:
- Implement proportionate arrangements to capture CEMP Staff travel mode data at induction (and/or through periodic workforce travel checks where appropriate);
 - Monitor workforce parking usage and access/attendance data (where available) to identify trends and opportunities to reduce single-occupancy vehicle trips;
 - Promote sustainable travel options and available facilities through inductions, periodic briefings/toolbox talks and communications (e.g. noticeboards and digital updates); and
 - Ensure CEMP Staff are aware of the aims of the CTMP worker travel measures and any applicable CEMP Land rules (e.g. parking, car sharing, cycling facilities and public transport information).

vii Measures to Prevent Track Out (Procedure)

- Q.vii.1 All vehicles leaving the CEMP Land will pass through the designated wheel cleaning facilities where required by ground conditions, and the CEMP Works Site Manager/Transport Coordinator will

ensure that vehicles are checked before exiting where there is a risk of mud or debris being carried onto the public highway.

- Q.vii.2 If mud or debris is identified on the public highway, road sweeping/cleaning will be arranged promptly. The need for wheel washing and vehicle checks will be applied dynamically, taking account of weather conditions, ground conditions and the nature of the works being undertaken.

viii Emergency Access (Procedure)

- Q.viii.1 Emergency services are to utilise the existing Order land access points to the CEMP Land. The CEMP Works Site Manager or CLP will ensure that any moveable obstacles (such as vehicles or CEMP Works equipment) are cleared as to not obstruct emergency vehicles.
- Q.viii.2 Public pedestrian access across the Order land is expected to be restricted during the CEMP Period in accordance with the applicable Order land controls. Pedestrian access provisions within the CEMP Land will therefore relate to safe movement of CEMP Staff and emergency services within/around the CEMP Land, including segregated pedestrian gates and safe pedestrian routes where required.
- Q.viii.3 Within the CEMP Land, the construction routes will be designed to ensure that pedestrians are adequately protected through the provision of separate pedestrian gates and footpaths during the CEMP Period.
- Q.viii.4 The Order land shall be secured 24 hours a day, 7 days a week, to control access and reduce security risks. Security staff would provide out of hours access to emergency services from the Order land access points.

ix Protection of Rail Assets (Procedure)

- Q.ix.1 This section is omitted because CEMP works will not impact Network Rail assets.

R. GREENHOUSE GAS (PROCEDURE)

- R.i.1 The Contractor and Site Controller will seek to reduce the greenhouse gas impacts of the CEMP Works by applying the PAS 2080:2023 carbon reduction hierarchy to the extent relevant to the CEMP Works. In practice, this means seeking first to avoid unnecessary carbon-generating activities, then to reduce emissions through efficient planning, procurement, and delivery, before considering lower-carbon alternatives where practicable and proportionate.
- R.i.2 The layout of compounds, stockpiles, haul routes, refuelling areas, and welfare locations will be organised as far as practicable to minimise unnecessary travel distances, double handling of materials, plant idling, and avoidable fuel consumption during the CEMP Works. Delivery planning, routing, and holding arrangements under the CTMP will be used to reduce unnecessary vehicle movements, queuing, and associated emissions.
- R.i.3 Procurement and supply chain decisions relevant to the CEMP Works will, where proportionate, take account of greenhouse gas impacts. This will include seeking opportunities to reduce embodied carbon through efficient material use, favouring lower-carbon or recycled-content materials where safe and suitable for the relevant engineering purpose, favouring local or shorter-distance supply where practicable, and requesting supporting carbon/environmental information such as Environmental Product Declarations or equivalent evidence where available and proportionate to the purchase.
- R.i.4 A proportionate record of greenhouse gas reduction actions and related supporting information will be maintained for the CEMP Works, using data and records that are reasonably available through normal project delivery and reporting processes. This may include, where relevant and available, information such as plant and fuel use, temporary power/energy consumption, delivery and haulage movements, significant material quantities, and waste/reuse/recycling information. The record will be reviewed from time to time by the Contractor's Environmental Manager and the Central Site Manager so that further practicable reduction opportunities can be identified and implemented where appropriate, with summary updates captured through routine project reporting.
- R.i.5 Illustrative measures that may be used, where relevant and proportionate to the CEMP Works, include but are not limited to:
- Using modern and efficient construction plant and delivery vehicles, including electric or alternative/lower-carbon fuelled plant where practicable;
 - Selecting temporary mechanical and electrical equipment (such as telecommunications) that is durable and energy efficient;
 - Favouring lower-embodied-carbon and recycled-content materials where safe and suitable for the relevant engineering purpose;
 - Reducing avoidable transport and handling emissions through efficient sourcing, delivery planning, and on-site material handling; and
 - Maximising reuse and recycling of materials and arisings where practicable so as to reduce waste and landfill disposal.
- R.i.6 This procedure is necessarily focused on the greenhouse gas impacts that can be influenced during the CEMP Period. More detailed carbon-reduction measures relating to the design and delivery of

later permanent works will be addressed in subsequent design, procurement and construction packages as those CEMP Works are developed.

OTHER MATTERS (PROCEDURE)

i. Cultural heritage and archaeology

This section is omitted because CEMP works will not affect the Kempston Hardwick Moated Site.