



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks
and adjoining land, Bedford

Construction Environmental Management Plan – Temporary Roads and Accesses

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Description of the CEMP Works and Arrangements for Site Welfare, Fencing and Construction Equipment

Appendix C

Figure Identifying Properties to be notified of works

ACRONYMS

Term	Definition
(AIlS)	Abnormal Indivisible Loads
ANPR	Automatic Number Plate Recognition
BCT	Bat Conservation Trust
Bedford BC	Bedford Borough Council
BPM	Best Practicable Means
CA	Construction Access
CDM	Construction (Design and Management) Regulations
CEMP	Construction Environmental Management Plan
CLO	Community Liaison Officer
CLOCS	Construction Logistics and Community Safety
CLP	Construction Logistics Provider
CTMG	Construction Transport Management Group
CTMP	Construction Traffic Management Plan
dB	Decibel
DMP	Dust Management Plan
DMS	Delivery Management System
EA	Environment Agency
ECOW	Ecological Clerk of Works
EHO	Environmental Health Officer
EnvCoW	Environmental Clerk of Works
EPSML	European Protected Species Mitigation Licence
ES	Environmental Statement
GHG	Greenhouse Gas

GPS	Global Positioning System
H&S	Health and Safety
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
ILP	Institution of Lighting Professionals
INNS	Invasive Non-native Species
LGV	Light Goods Vehicle
LHA	Lorry Holding Area
LMP	Lighting Management Plan
MEWP	Mobile Elevating Work Platform
MHCLG	Ministry of Housing, Communities and Local Government
NSRS	Noise Sensitive Receptor
NVIA	Noise and Vibration Impact Assessment
OS	Ordnance Survey
OSC	Operational Support Centre
PAS	Publicly Available Specification
PPG	Pollution Prevention Guidance
PPV	Peak Particle Velocity
PWMS	Precautionary Works Method Statement
RAMS	Risk Assessments and Method Statement
SDO	Special Development Order - The Town and Country Planning (Entertainment Resort Complex, Bedford) Special Development (No. 2) Order 2025
SMP	Soil Management Plan
SMS	Short Message Service
SQE	Suitably Qualified Ecologist
WC	Water Closet

WJ	Wilson James
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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 Site Manager	The Contractor's Site Manager delivering the CEMP Works
Contractor's Environmental Manager	The Contractor's Environmental Manager responsible for ensuring compliance with the environmental requirements
Transport Coordinator	The Contractor's traffic management coordinator
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 2029.
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
Scope, Governance, Command and Escalation	X				
A. General Management Processes	X				
B. Construction Working Hours	X				
C. Engagement with the Neighbouring Residents	X				
D. Noise and Vibration		X			CEMP Works are limited to low impact construction activities
E. Control of Dust and other Emissions to Air		X			CEMP Works are unlikely to generate exceedances above the IAQM directed site action level of 190ug/m3 over a 1 hour averaging period
F. Material Storage Management (Method Statement)		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
G. Soils Management		X			A standalone Soil Management Plan is not considered proportionate for the CEMP Works because the anticipated volume of excavated material is limited (circa 2,000m ³) and can be appropriately managed within the CEMP Land.
H. Arrangements for Site Welfare, Fencing and Construction Equipment and Plant	X				
I. Construction Waste Management		X			Stockpiles arising from CEMP Works will be of a scale that can be appropriately managed on CEMP Land.
J. Construction Lighting Management (Procedure)	X				
K. Strategy for Piling Operations and Associated Risk			X		No piling work within CEMP Works

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
Assessment (Method Statement)					
L. Management of Surface Water	X				
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

SCOPE, GOVERNANCE, COMMAND AND ESCALATION

i Introduction – The CEMP Works

This Construction Environmental Management Plan (CEMP) details the environmental management measures associated with temporary construction access points from public roads and the associated access routes required to deliver construction work 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 Temporary Roads and Accesses CEMP Works. In particular:

- **Section D** (Noise and Vibration) includes noise monitoring trigger and action levels, but explains why a bespoke assessment and project-specific exceedance regime are not proportionate for these low-impact CEMP Works.
- **Section E** (Control of Dust and Other Emissions to Air) includes the action level, but explains why additional monitoring metrics are not proportionate given the limited scale, duration, and nature of the CEMP Works;
- **Section G** (Soils Management) is considered relevant but not proportionate to the CEMP Works therefore have limited information within the CEMP; and
- **Section L** (Management of Surface Water) follows the OCEMP requirement for temporary drainage / runoff controls and pollution prevention but is proportionate to the CEMP Works with mitigation measures tailored to the specific access works and receptors relevant to this CEMP.

Accordingly, this CEMP should be read as a proportionate, works-specific application of the OCEMP to the Temporary Roads and Accesses 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
Broadmead Road – Construction access points and access routes	Construction of a direct construction access point and access route from Broadmead Road to the West Gateway Zone. Construction of a construction access point and access route from Broadmead Road to the Core Zone.	Temporary (CEMP Works elements removed/reinstated by end 2031, under a separate CEMP)
Broadmead Road/Woburn Road junction – temporary traffic signals	Provision (including installation and operation) of traffic signals and control devices to enable a signalised junction to be operational at the intersection of Broadmead Road and Woburn Road, for construction traffic management purposes.	Temporary (This CEMP Works element will be superseded by permanent traffic signals by end 2029)

Aspect of CEMP Works	Description of CEMP Works	Duration of CEMP Works
Manor Road – construction access points and access routes	Construction of two direct construction access points and access routes from Manor Road to the Core Zone. Construction of two direct construction access points and access routes from Manor Road to the Lake Zone.	Temporary (CEMP Works elements removed/reinstated by end 2031, under a separate CEMP)
Manor Road – localised road alterations (passing bays)	Localised alteration/improvement works to the existing public road to facilitate construction traffic (including widening and passing bays where required), as construction work associated with the construction access arrangements.	Temporary (CEMP Works elements to be superseded by Manor Road realignment by end 2031, under a separate CEMP)
Temporary surface water and drainage controls (for construction access works)	Diversion/relocation of roadside ditches/drainage features and provision of temporary drainage structures to convey, attenuate or treat surface water runoff associated with the construction access works.	Temporary (CEMP Works elements removed/reinstated by end 2029)
Utility diversions (associated with construction access works)	Utility diversion/relocation/connection works required to accommodate the construction access arrangements, comprising construction work to existing services and associated apparatus/infrastructure.	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 Broadmead Road (West Gateway Zone) compound will be adapted in the future for the construction of the WGZ roads (under a separate CEMP).	Temporary (CEMP Works elements removed/reinstated by end 2029)
Protection of constraints/exclusion zone	Establishment of constrained/exclusion zones through provision/installation of fencing, signage, and other means of enclosure to prevent encroachment until enabling controls/conditions are satisfied (including archaeology areas, dark corridors, potential land remediation areas, and protected habitat areas).	Temporary (CEMP Works elements removed/reinstated by end 2029)
Access and Logistics	Temporary access routes (including construction access roads and tracks/means of access) and controlled entry points will be installed to facilitate	Temporary

Aspect of CEMP Works	Description of CEMP Works	Duration of CEMP Works
	safe movement of construction workers, vehicles, plant, and materials across the CEMP Land.	(CEMP Works elements removed/reinstated by end 2029)
CEMP Land Security and Lighting	Temporary fencing/hoardings, locked gates, and downward-directed lighting will be installed to provide site security and access control while minimising light spill to sensitive receptors	Temporary (CEMP Works elements removed/reinstated by end 2029)

All CEMP Works and associated facilities are within the CEMP Land. 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)**.

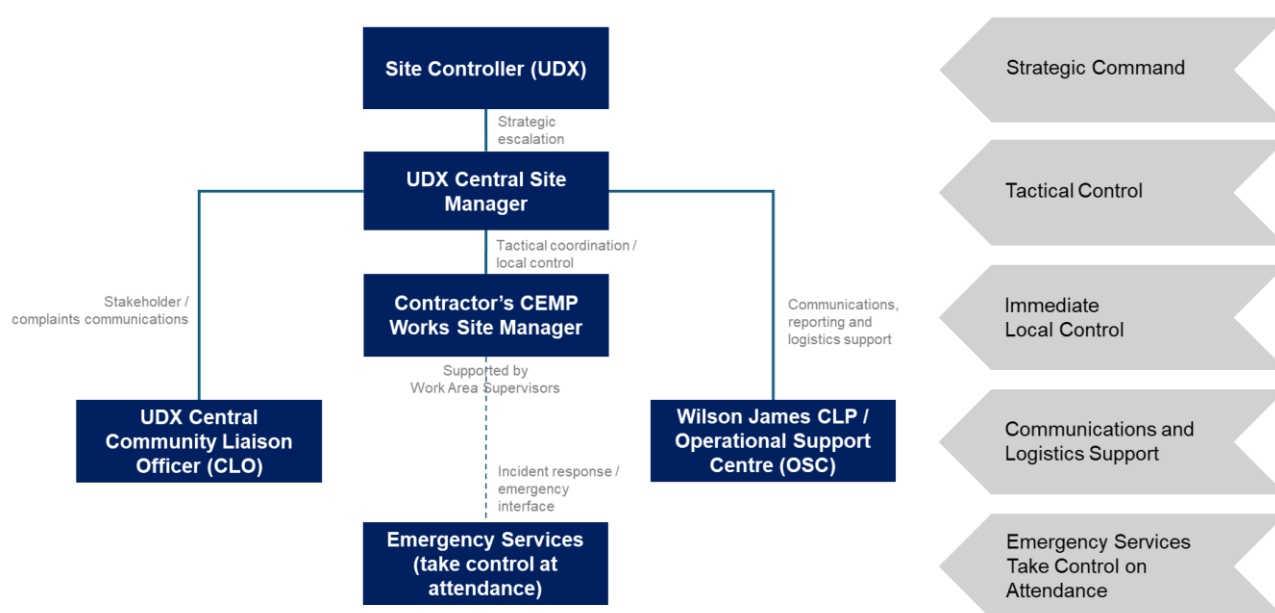
All detail relating to construction traffic management, including construction routing, logistics, road, and footpath closures is presented in **Section Q: Construction Traffic Management**.

A full description of the CEMP Works is included in **Appendix B: Description of the CEMP Works and Arrangements for Site Welfare, Fencing and Construction Equipment**.

ii Key Incident and Site Governance Roles (Policy)

For the purposes of incident response during the CEMP Works, local control rests with the Contractor's CEMP Works Site Manager (CEMP Works Site Manager), tactical coordination rests with the UDX Central Site Manager (Central Site Manager), strategic command rests with the Site Controller, Construction Logistics Partner (CLP) / Operational Support Centre (OSC) provides communications and reporting support, and the Central CLO leads stakeholder communications. These roles are outlined below.

The CEMP Works incident command, governance and support structure is shown below.



Emergency Response (Procedure)

This CEMP sets the command, governance, and escalation framework for the CEMP Works.

Detailed incident scenarios, immediate response actions, contact cascades and incident-specific role allocations are addressed in the Project Incident Response and Health & Safety Plan.

This section sets out the controlling governance and incident-response procedure for the CEMP Works, including the command structure, escalation principles, emergency contacts, indicative timings and coordination with the emergency services and relevant regulatory authorities.

- These arrangements apply to any type of incident affecting the CEMP Works, including health and safety incidents, environmental incidents, complaints escalation, spills, leaks, containment failures, site-security incidents and any other event requiring coordinated response, escalation, or notification.
- These arrangements operate within the command structure set out in the Governance section above.

Emergency command, escalation, and decision-making for the CEMP Works operate in accordance with the governance structure set out above, the key roles table below, and the Incident Escalation and Command Procedure.

Key Incident Governance and Command Roles

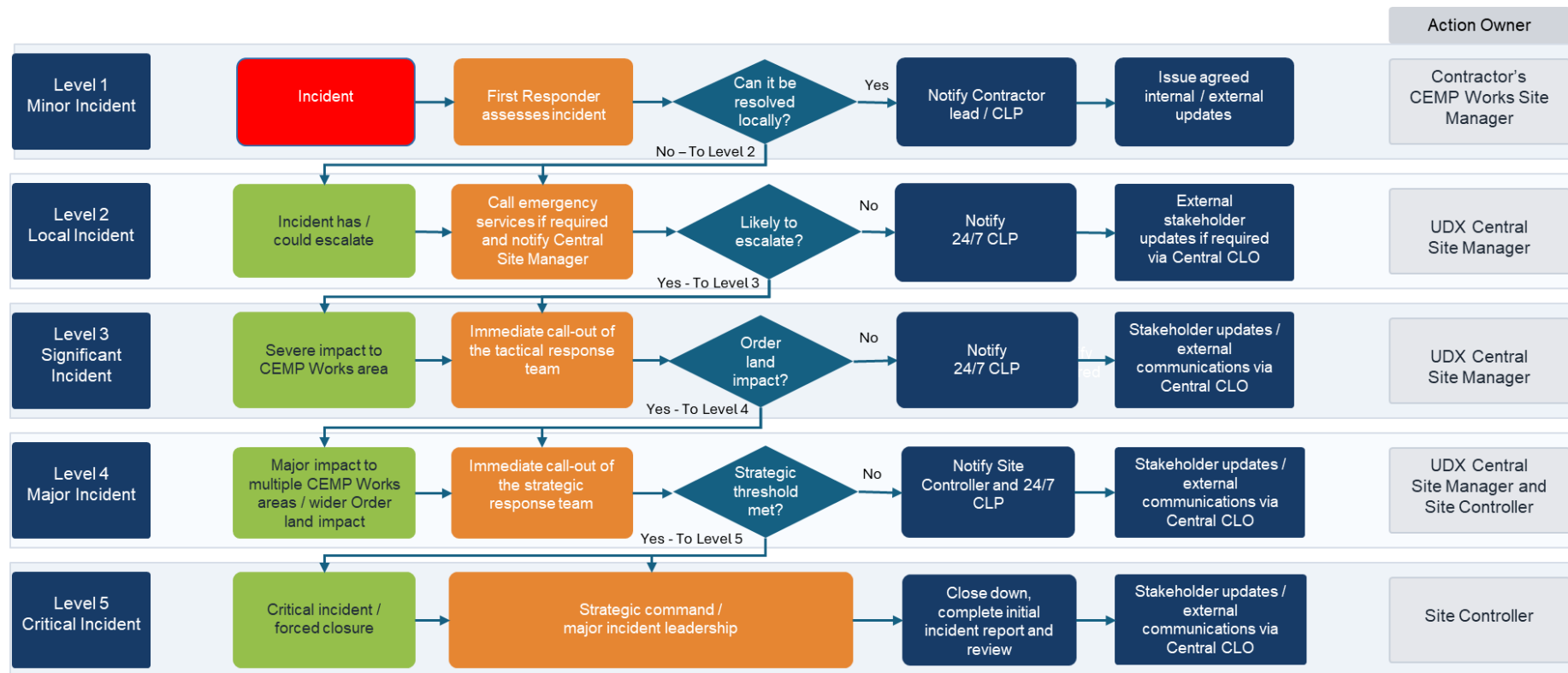
Role	CEMP reference Role Description	Primary Function in Incident Response
Site Controller	■ Refer to Table A-3 .	■ Strategic command where escalation beyond the local / tactical response is required.
Central Site Manager	■ Refer to Table A-3 .	■ Tactical lead; receives escalations and coordinates response across work areas.
CEMP Works Site Manager	■ Refer to Table A-3 .	■ Local operational lead responsible for immediate control, stop-work, and make-safe actions.
CLP / OSC	■ Refer to Table A-3 .	■ Provides communications, call handling, reporting, and logistics support; not incident command.
Central CLO	■ Refer to Table A-3 and Paragraph C.i.1 .	■ Leads stakeholder, resident, and external communications.
Contractor CLO	■ Refer to Table A-3 and Paragraph C.i.3 .	■ Supports local communications and feeds issues into central arrangements.

Incident Level Definitions (for the purposes of the CEMP Works)

- Level 1 – Minor Incident - Contained within a single CEMP Works area with no wider impact and capable of resolution through local contractor control.
- Level 2 – Local Incident - Incident with potential to escalate beyond the immediate work area requiring notification and coordination by the Central Site Manager.
- Level 3 – Significant Incident - Incident causing material impact to the CEMP Land or requiring coordinated tactical response.
- Level 4 – Major Incident - Incident affecting multiple CEMP Works areas or having potential wider Order land, third-party or reputational impact requiring strategic escalation.
- Level 5 – Critical Incident - Severe incident with major safety, environmental or operational consequences requiring strategic command, potential evacuation, or site closure.

In the event of an emergency, the severity level shall be determined to inform escalation level. This shall be done in accordance with the CEMP Works Incident Escalation and Command Procedure below.

The CEMP Works Incident Escalation and Command Procedure is shown below.



For clarity, operational response actions shown in the escalation procedure are led by the CEMP Works Site Manager unless and until escalation requires tactical direction by the Central Site Manager or strategic command by the Site Controller. Reporting, call handling, and contact-cascade actions are supported by the CLP / OSC, and stakeholder / resident communications are led by the Central CLO.

In accordance with the Incident Escalation and Command Procedure above, below are the implied timings for each incident Level 1–5.

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

The following emergency contacts are to be displayed on CEMP Land signage:

Primary Emergency Number

- OSC: +44 (0)20 3794 6090
- CLP local incident / environmental reporting number (where implemented on the CEMP Land): 0345 873 5801.

Emergency Services

- Police, Fire and Rescue, and Ambulance: 999

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 construction areas 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.
- A.i.2 Inspections are to be undertaken by the Contractor, who will issue a performance report for the CEMP Works on a weekly basis to the Central Site Manager. This report will include a summary of environmental inspections conducted, audits completed, any complaints, issues or environmental incidents recorded, the action taken to resolve them, and the date when they are closed out. Material non-compliances, repeated non-compliances, or issues with the potential to affect third parties, programme, reputation, or compliance will be escalated to the UDX Central Site Manager in accordance with the reporting and escalation arrangements. Where stakeholder or regulator communication is required, this will be coordinated through the Central CLO.

Reporting

- A.i.3 Inspections and reports, 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.

Table A-1 - Reporting Requirements

CEMP Ref	Report	Frequency	Responsibility
A.i.3	CEMP Performance Report	Weekly	Central Site Manager
A.i.3	Regular internal environmental inspections	During 'high environmental risk' activities of the CEMP Works.	Central Site Manager and the Contractor
Governance / Command / Escalation section and Section C	OSC Incident Report	Whenever a complaint, incident or emergency is reported to the CLP's OSC Control Room	CLP's OSC Control Room call recipient / reporting point.
Governance / Command / Escalation section and Section C	CLO Reports	Weekly	Contractor CLO
Q.ii	DMS Reporting	When any breaches of the HDV upper limits occurs	Transport Coordinator
Q.ii.19	TSG Learning Reports	Following an incident related to construction traffic.	The Contractor via their Transport Coordinator
Q.ii.19	TSG Feedback Reports	Following an incident related to construction traffic.	The Contractor via their Transport Coordinator

CEMP Ref	Report	Frequency	Responsibility
Q.ii.20	TSG Breach Report	If requirements of the CTMP are not being met.	The Contractor via their Transport Coordinator

Internal Communication

- A.i.4 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 - Meeting Requirements** 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.4	Environmental Issues	Weekly	CEMP Works Site Manager	Meetings to discuss particular CEMP Works issues, method statements, task/activity briefings, toolbox talks, inductions, environmental notices, and environmental alerts.

ii Competence, Training and Awareness (Procedure)

- A.ii.1 All the CEMP Staff will complete corporate, CEMP Land and environmental inductions prior to commencing CEMP Works, covering health, safety and environmental requirements, and site-specific risks. Toolbox talks will include the following:
- Dust and Air Quality;
 - Be A Good Neighbour;
 - Materials Management and Housekeeping; and
 - Waste Management.

- 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 Roles and responsibilities related to the environmental management of the CEMP Works of the Site Controller and 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**.

Note: The key governance and incident command roles for the CEMP Works are set out in the Governance, Command and Escalation section near the front of this CEMP. **Table A-3** defines the wider environmental, technical and specialist roles supporting delivery of the CEMP Works.

Table A-3 - Roles and Responsibilities

Role	Responsibility
SITE CONTROLLER RESPONSIBILITIES	
Site Controller (or Designated UK Site Controller)	■ Acts as the strategic command lead for incidents and emergencies where escalation beyond the local or tactical response is required. ■ Makes strategic decisions relating to Order land-wide impacts, evacuation, closure, and engagement with external authorities where required. ■ Provides senior oversight of compliance with the endorsed CEMP and SDO requirements.
UDX Central Site Manager (Central Site Manager)	■ Acts as the tactical escalation lead for the CEMP Works, receiving escalations from the Contractor, CLP/Transport Coordinator, and community interface arrangements (refer to Paragraph C.i.2); ■ Coordinates the response at the interface between the CEMP Works and other affected work areas, while the Contractor retains responsibility for directing and managing the response within the CEMP Land; and ■ Defines and oversees the reporting, escalation, and coordination framework for the CEMP Works.
Construction Logistics Provider (CLP)	■ Provides logistics coordination, call handling, reporting support, and out-of-hours contact arrangements. ■ Supports implementation of traffic, access, communal logistics and incident reporting systems. ■ Does not act as the incident command authority.
UDX Central Community Liaison Officer (Central CLO)	■ Leads resident, adjoining landowner and stakeholder communications relating to the CEMP Works.

Role	Responsibility
	- Oversees the complaints and community interface process operated through the project arrangements. - Coordinates external updates and engagement with Bedford Borough Council (Bedford BC) and other stakeholders where required.
Construction Transport 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 (Site Manager)	- Ensuring adherence to the CEMP within the CEMP Land maintaining a safe working environment, and reporting relevant issues to the Central Site Manager; - Managing day-to-day reporting and feedback to the Central Site Manager; - Where required, attending regular coordination meetings chaired by the Central Site Manager; - Reporting complaints to the Contractor CLO; - Reporting to the Central Site Manager on a weekly basis, or where required following an environmental incident or completion of a milestone of CEMP Works; - Ensuring all CEMP Staff carry out their duties and responsibilities under the endorsed CEMP and relevant appendices; - Ensuring CEMP Staff are briefed on the applicable dust, flood, and incident-response measures relevant to their work area; and - Has immediate local control of the affected work area in case of incident, implements stop-work and make-safe actions, and initiates the required notifications.
Contractor Environmental Manager (Environmental Manager)	- Provide input to manage and mitigate environmental impacts during construction, - Advise and coordinate high risk environmental areas of the CEMP Works, - Coordinate and manage the permitting and consents, - Implementing the CEMP.
Contractor CLO (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

Role	Responsibility
	Ensuring all local residents and stakeholders are kept informed of progress and key issues and ensuring local residents and stakeholders are kept informed of progress and key issues and escalating relevant information through the central project community interface arrangements in force at the time.
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 measures outlined in 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 the Construction Site Waste Management Plan, set waste targets, and monitor all waste movements within the Order land and final disposal if regulated waste outside the Order land.
CLP's 24-hour Operational Support Centre (OSC) Control Room Call Recipient	- Receives calls for incident reporting, emergencies and matters requiring an out-of-hours response; and - Compiles the initial incident report / notification in accordance with the project incident reporting arrangements.

iii Behavioural Standards for Construction Workers (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 and Contractor CLO 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 shall:

- 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 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 and 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 the CEMP Land;
- e) Ensure no damage of any kind is caused to property 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 including a variety of toolbox talks and other communications.

A.iii.6 It is of the highest importance that the Code is respected by workers at all levels. If someone acts in ways that are contrary to this Code, the following will be actioned:

- In the first instance discuss the person's behaviour with their 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.

A.iv.2 Higher risk CEMP Works such as work at height, operation of mobile plant, excavation, 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 site coordination, ensures that high-risk activities such as excavation, utilities diversions, work adjacent to live carriageways, plant operations and temporary traffic management interfaces 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 Order land rules, behavioural standards and environmental responsibilities as established in **Section A.iii**.
- A.iv.5 Management of these risks would occur through regular toolbox talks, pre-start briefings, and RAMS briefings. The Contractor will promote a positive safety culture through active consultation with workers within the CEMP 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 CEMP Land and the nearest Accident and Emergency facility identified and communicated to CEMP Staff. In the event of a serious accident or injury, the supervisor / first aider will immediately stop work in the affected area, make the area safe so far as reasonably practicable, and contact the emergency services via 999 where required. The 24-hour Security Control Room number (0345 873 5801) will also be notified without delay so that site access, incident coordination and liaison with emergency responders can be managed in accordance with the Governance, Command and Escalation section near the front of this CEMP, together with the contact arrangements in **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 CEMP Land.
- A.iv.8 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 operatives 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 CEMP Works induction pack; and
- A.iv.9 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.

Nighttime works are defined as any works undertaken between dusk and dawn of any given day.

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 CEMP Works that may be undertaken during extended construction hours comprise the following:

- Highway works within traffic management;
- Resurfacing works;
- Connection and diversion of existing utilities;
- Installation and commissioning of temporary traffic signals; and
- Junction improvements between Woburn Road and Broadmead Road.

- B.ii.2 Notification process for extended construction working hours is as follows:

- The Site Controller will inform Bedford BC as soon as reasonably practicable of the reasons and likely duration, with a copy provided to MHCLG.

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 Bedford BC in advance. The programme for extended working hours as well as the nature of these CEMP Works, once agreed with Bedford BC, will be notified to relevant stakeholders.

- B.iii.2 In the case of CEMP Work required in an emergency, or instances where CEMP Staff, public or environmental safety would be compromised if CEMP 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 Justification for 24-hour working will be submitted to and endorsed by Bedford BC in advance, including an obligation to notify MHCLG, (following the notification process in **Paragraph B.ii.2**) local residents and relevant stakeholders in advance, including details of any applicable noise control measures.

C. ENGAGEMENT WITH THE NEIGHBOURING RESIDENTS

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

- C.i.1 The Promoter will appoint an identified contact who will be responsible for fulfilling the role of the Central CLO for all CEMP Work packages 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 through the project community interface arrangements in force at the time, coordinated by the Central CLO and supported by the CLP and Contractor CLO where applicable, which detail the potential impacts to the neighbouring residents along with 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 five 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. Contractor CLOs will report to the Central CLO on a weekly basis, providing updates on upcoming activities, community issues raised and actions taken.
- C.i.4 **Appendix C: Figure Identifying Properties to be notified of CEMP Works** identifies the properties to be notified of the CEMP Works.

ii Complaints Procedures for Impacts from CEMP Works (Procedure)

- C.ii.1 Signage will be displayed at prominent positions around the CEMP Land providing contact details for the receipt of incidents, emergencies, and complaints. The notices will include the CLP's 24 hour OSC 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 OSC Control Room contact number is 0345 873 5801. This number will be used for incident reporting and emergencies plus those requiring an out of hours response. A prompt response is integral to emergency management, with MHCLG to be informed within 48 hours.

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 24-hour Security Control Room will then coordinate site access, internal escalation and liaison with the responding emergency services and relevant regulatory authorities.

D. NOISE AND VIBRATION

A standalone package-specific Noise and Vibration Assessment is not considered proportionate; however, proportionate trigger/action-based monitoring and response arrangements are included in this CEMP to manage any unexpected noise or vibration issues arising from the CEMP Works.

The CEMP Works are limited to low-impact construction activities, such as excavation, surfacing and kerbing, undertaken using standard, non-percussive equipment, and do not involve operations known to generate elevated noise or vibration levels such as piling, heavy demolition, impact hammers, or continuous high-powered plant.

Table D-1 and **Table D-2** set out the prescribed noise and vibration limits that apply on an Order Land-wide basis and are included in this CEMP for reference. For these Temporary Roads and Accesses CEMP Works, a bespoke package-specific noise and vibration assessment, active monitoring regime and project-specific exceedance mitigation plan are not considered proportionate because the works are limited to relatively short-duration, low-impact activities (such as excavation, surfacing and kerbing) using standard non-percussive plant, and do not include piling, demolition, impact hammers or other activities typically associated with elevated noise / vibration effects.

All plant and equipment used for the CEMP Works will nevertheless be checked daily, maintained in accordance with manufacturers' instructions, and operated in accordance with good practice for the control of noise and vibration on construction sites. Any unexpected issue, complaint or incident related to noise or vibration will be managed through the Governance, Command and Escalation section near the front of this CEMP, together with the complaints and contact arrangements in **Sections A** and **C** where relevant.

Table D-1 - 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

Table D-2 - Vibration monitoring trigger and action levels

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

E. CONTROL OF DUST AND OTHER EMISSIONS TO AIR

It is deemed that the CEMP Works are unlikely to generate exceedances above the IAQM action level of 190 ug/m³ over a 1-hour averaging period; accordingly, a more detailed dust and air emissions management regime is not considered proportionate for these works. That benchmark is derived from IAQM guidance and has been adopted here as the relevant proportionate screening / action metric for the CEMP Works.

Additional dust deposition monitoring methods referred to in IAQM guidance (for example Frisbee-type deposition gauges, glass slide gauges or sticky pads) have not been included because they are not considered proportionate to the scale, duration and nature of these works, which do not include activities typically associated with elevated dust risk such as crushing, grit blasting or extensive material processing. CEMP works will be undertaken by plant operating under Euro 6 emissions standards.

F. MATERIAL STORAGE MANAGEMENT (METHOD STATEMENT)

- F.i.1 Stockpiles arising from CEMP Works will be of a scale that can be appropriately managed on CEMP Land, as noted in **Section G**. A detailed Materials Management Plan is therefore not considered proportionate for the CEMP Works and is omitted from this CEMP. However, measures related to the storage of materials arising from CEMP Works are outlined below.
- 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 recycled construction aggregates and contaminated soils awaiting disposal outside the Order land and/or treatment within the Order land 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 If identified, hazardous materials will be segregated in labelled, closed containers or stockpiles to minimise the risk of cross-contamination.
- F.i.5 Fuel, oil and chemicals will be stored in secondary containment and located a minimum of 10m from any watercourse.

G. SOILS MANAGEMENT

A standalone Soil Management Plan (SMP) is not considered proportionate for the CEMP Works because the anticipated volume of excavated material is limited to circa 2,000m³. That volume can be appropriately managed within the CEMP Land and through the controls already set out in **Section F** (material storage and handling), **Section I** (waste removal and licensed carriers) and **Section Q** (construction traffic management and routing).

The anticipated volume equates to approximately 250 HGV movements in total, which would be distributed across the relevant work period and are not considered significant in the context of the wider construction traffic controls applicable to the CEMP Works. Any excavated material will therefore be managed through the existing controls in this CEMP rather than through a standalone SMP.

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** have been designed to provide greater provision than the baseline requirements for CEMP Staff anticipated to use these compounds. This approach has been adopted to:

- Provide resilience and flexibility to accommodate peak workforce periods, overlapping activities, and changes in phasing without the need for additional temporary land take or reconfiguration;
- Reduce the frequency of compound expansion, relocation, or modification, thereby minimising disruption, environmental impact, and programme risk;
- Enable efficient logistics and workforce management, including segregation of functions where required to improve safety and operational performance;
- Support good welfare standards and ensure sufficient capacity during periods of intensified activity.

H.i.2 These compounds and facilities have been located and designed to minimise visual impact.

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. This will minimise the exposure of surface water and groundwater to contaminated run-off; as well as avoid impacts to 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;
- Cover 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 Construction compounds and will be sited away from sensitive features such as known bat roosts, watercourses and running water habitats.

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 under WM3, with hazardous materials stored with secondary containment where required. Site 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.ii.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.
- I.ii.2 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 (PROCEDURE)

J.i.1 This section provides the Lighting Management Plan (LMP) for the CEMP Works. Construction lighting will be carefully managed to prevent unnecessary disruption to the surrounding environment and neighbouring residents.

J.i.2 Dark corridor illuminance limits (Condition 8(7)):

- Where CEMP Works require temporary lighting within or adjacent to a designated dark corridor, lighting will be designed, installed, and operated so that illuminance at the edge of the dark corridor does not exceed the applicable limit:
 - 0.5 lux where the dark corridor is associated with trees suitable for bat roosting; and
 - 1.0 lux in other parts of the dark corridor (as applicable).

Compliance with these limits will be achieved through appropriate selection, positioning, orientation and shielding of luminaires (e.g. directional cowls), minimising mounting height and operating hours, and switching off lighting when not required for safety or security.

J.i.3 The following measures will be used to manage construction lighting:

- Night works will be avoided where practicable to reduce the lighting of sensitive habitats and potential disturbance to species. Habitats with potential to be affected by night works are:
 - Trees with confirmed/potential bat roosts along Manor Road;
 - Trees with confirmed/potential bat roosts along Broadmead Road;
 - Trees with confirmed/potential bat roosts along Woburn Road; and
 - The proposed dark corridor crossing Manor Road from the Lake Zone to the Core Zone.
- No night works will be undertaken adjacent to the dark corridor. For the purposes of this Section, “night works” means any CEMP Works undertaken between dusk and dawn.
- Lighting around CEMP Works and compounds will utilise directional cowls to reduce light spill and will be directed inwards to the CEMP Works and compounds and kept at as low a height as is practicable;
- Lighting levels around site compounds will be kept to the minimum necessary for security and safety. This has been set as a lux level of 1 as per Condition 8: Habitat Creation and Enhancement Plan of the SDO;
- Minimum light levels necessary for the relevant task/function will be used. This may equate to reducing light intensity, and/or using the minimum number of light sources; and
- Temporary lighting used for construction will be switched off when not in use.

Temporary Lighting Mitigation Measures

J.i.4 In addition to the measures above, where use of artificial lighting cannot be avoided in areas of sensitive habitats, any temporary lighting during construction will follow guidance produced by the Institution of Lighting Professionals (ILP) in conjunction with the Bat Conservation Trust (BCT). This includes the following recommended measures:

- Avoid light spill onto known bat roosts, trees, woodland edge, hedgerows, and watercourses;
- Avoid light spill onto known badger setts or baths;
- Light spill to be minimised through good design, with physical shields installed where necessary;
- Creation of a 'buffer zone' of very low illuminance (if any) adjacent to established or proposed key habitats, such as treelines;
- Use narrow spectrum light sources where practicable to lower the range of species affected by lighting. Specifically, this should avoid shorter wavelength blue light, using instead warm/neutral colour temperature lighting; and
- Use light sources that emit minimal ultra-violet light to avoid attracting night-flying invertebrate species.

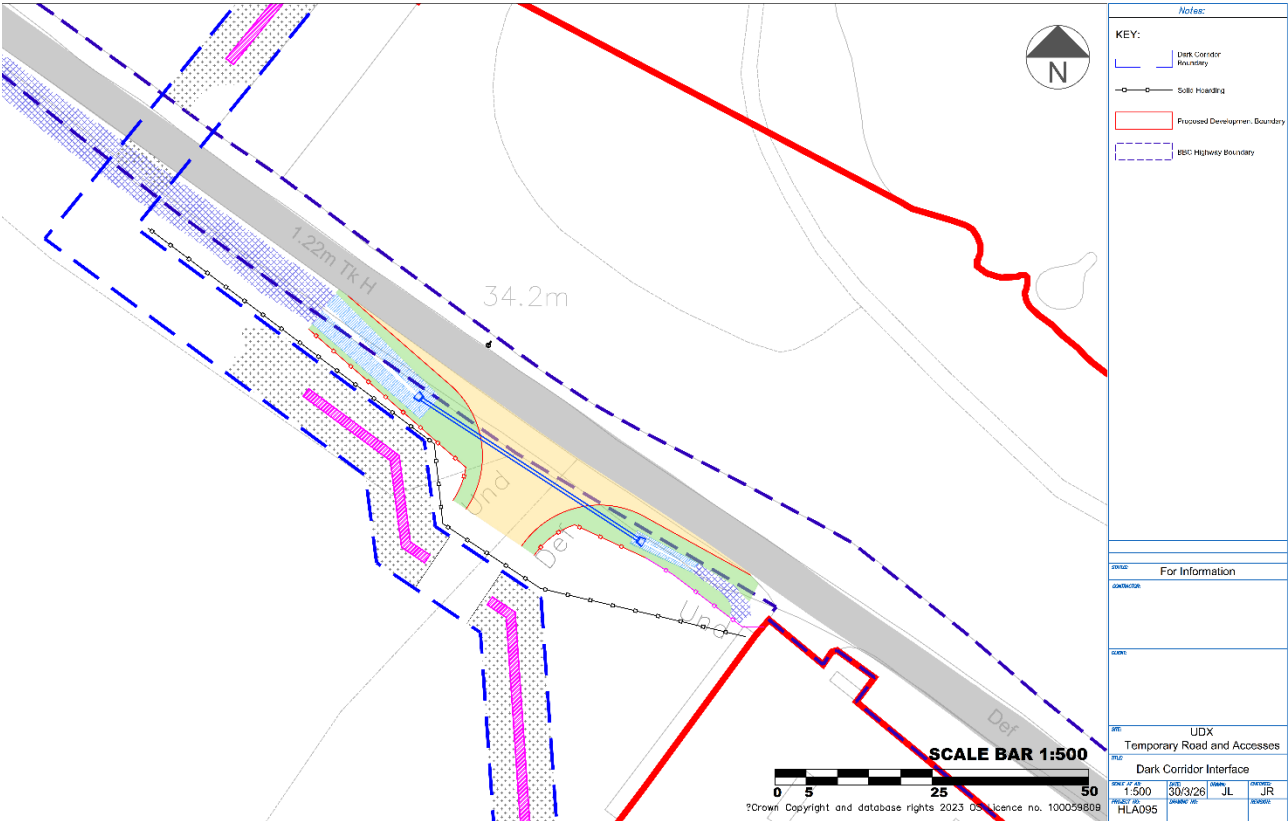
Dark Corridor Mitigation Measures

J.i.5 CEMP Works to construct the Core Zone access off Manor Road will interface with the proposed dark corridor. No night works are planned in this area, but the following mitigation measures will be implemented should night works be required:

- Lighting around CEMP Works will utilise directional cowls and will be directed inwards to the CEMP Works and compounds and kept at as low a height as is practicable;
- Lighting levels around site compounds will be kept to the minimum necessary for security and safety.
- Minimum light levels necessary for the relevant task/function will be used. This may equate to reducing light intensity, and/or using the minimum number of light sources; and
- Light meters to be installed along the boundary of the dark corridor to monitor compliance.

Should the above measures be insufficient, a solid hoarding will be installed between the CEMP Works and the dark corridor to eliminate light spill. Details for solid hoardings can be found in **Figure J-1**.

Figure J-1 - Dark Corridor Mitigation Plan for Manor Road.



K. STRATEGY FOR PILING OPERATIONS AND ASSOCIATED RISK ASSESSMENT (METHOD STATEMENT)

- K.i.1 This section is omitted because there are no piling activities in the CEMP Works and it is therefore not relevant.

L. MANAGEMENT OF SURFACE WATER

For the purposes of this CEMP, 'receiving network' means the CEMP Land temporary surface water drainage arrangements that receive runoff from the CEMP Works, including (as applicable) temporary sacrificial SuDS features (e.g. drainage blankets, land drains, gravel traps), and temporary ditches/swales, attenuation/settlement features. No discharge to Elstow Brook or Harrowden Brook is proposed as a result of the CEMP Works.

For the purposes of this CEMP, the diversion / relocation of roadside ditches and drainage features relates to works on Broadmead Road and Manor Road associated with the temporary construction access arrangements.

i Temporary Structures (Procedure)

L.i.1 The following will be implemented during the CEMP Period:

- Temporary sacrificial SuDS features, including a land drain and drainage blanket within the Broadmead Road Compound (refer to **Appendix B(1)**), will be implemented during the CEMP Period. These temporary runoff controls include the bunded hardstanding area provided for wheel wash facilities within the Broadmead Road compound, together with associated localised runoff capture / treatment measures.
- These SuDS features will enable surface water runoff from tarmacked and other hardstanding areas to be collected and managed before entering the receiving network. No discharge to either Elstow Brook or Harrowden Brook is proposed as part of the CEMP Works.
- The SuDS features will be inspected weekly to ensure that they are working effectively;
- The anticipated volumes of surface water are expected to be minimal due to the small size of excavations on CEMP Land and the nature of the CEMP Works being undertaken in the Spring/Summer period. It is with this justification that these measures are considered proportionate to the CEMP Works. Dewatering of SuDS and ponds into watercourses is not anticipated to be required; and
- The temporary drainage / runoff measures for the CEMP Works have been developed on the basis that the existing drainage regime capacity will be maintained, with runoff from the limited access works directed into existing drainage features and temporary controls where required. Although the works are programmed for the spring / summer period, the Contractor will not assume benign weather conditions. During periods of heavy rainfall, elevated runoff risk or where inspections indicate that controls require maintenance, the relevant activities will be modified, resequenced or temporarily paused and the temporary drainage / runoff controls will be inspected and maintained so that they remain effective.

ii Flood Emergency Measures (Procedure)

L.ii.1 Flood emergency measures include the following:

- The 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 Land users aware of the situation, with on ground Emergency Services instructions taking precedence;
- In case of an evacuation, the Central Site Manager in liaison with 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 CEMP Works 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, site-specific flood risks, information of flood kits, emergency contacts and roles of the various authorities involved;
- Flow controls and attenuation will be implemented to prevent permanent capacity issues within the network via means of hydrobrakes, weir walls and gravel traps; and
- CEMP Staff will be made aware of CEMP Land-specific flood risks from rivers, surface water, and ground water sources during the site 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 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, wheel washing and concrete mixing. Measures to reduce the potable and non-potable water use within the 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 to avoid adverse effects on the receiving network and water environment.

L.iii.4 All foul water arising from the CEMP Works will be managed as follows:

- Holding tanks will be appropriately sized to accommodate anticipated volumes, clearly labelled, and maintained in good condition to prevent leaks, overflows, or contamination of land and watercourses. Storage levels will be regularly monitored, and the tank will be emptied at an agreed frequency by a suitably licensed waste contractor. Disposal will be to a local wastewater treatment works in Bedford. It is noted that Bedford is not located within a nutrient neutrality area of concern;
- 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 or any watercourses.
- 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 (Procedure)

L.iv.1 The following measures are to be implemented near water bodies or watercourses:

- High risk activities as part of CEMP Works (e.g. mixing of materials, hazardous materials storage, fuel storage tanks) are not to be undertaken within 10m of the of the water's edge/bank top of any water bodies and drainage systems. An exclusion zone from the water's edge of at least 10m on Elstow Brook will be enforced throughout the CEMP Period.

L.iv.2 Planning and set-up (before CEMP Works commence in the area):

- 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 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.4 Aquatic ecology considerations:
- No CEMP Works will affect the flow of the watercourse and therefore do not cause impediment to fish passage.
- L.iv.5 These measures are to be read in conjunction with **Section N** 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 construction work on part of the Order land where the carrying out of that construction work will cause significant harm or significant pollution, or a significant possibility of significant harm or significant pollution.
- M.i.2 **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.3 This assessment applies to the CEMP Works within the CEMP Land and considers:
- Risks arising from historic contamination identified through available CEMP Land condition reporting and investigation information; and
 - Risks arising from permitted CEMP Works under this CEMP (including earthworks/excavation, stockpiling/handling, dewatering where applicable, refuelling/plant maintenance, concrete/cement works, wheel washing, and haul route operations).
- M.i.4 The CEMP Works include activities that may give rise to relevant contamination risks, such as the establishment of temporary construction compounds and excavation. 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.5 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 site workers, nearby receptors, and ecological habitats; and
 - Former utility corridors, and historic road margins can have elevated risk due to legacy railway operations, buried services, or informal tipping.
- M.i.6 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;
 - Concrete washout water, which is highly alkaline, has the potential to pollute ground and water bodies if not contained in designated washout facilities;
 - 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.7 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 haul routes, temporary works, or stockpile areas, especially during periods of heavy rainfall.

M.i.8 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.9 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.

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 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 **Paragraph 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.

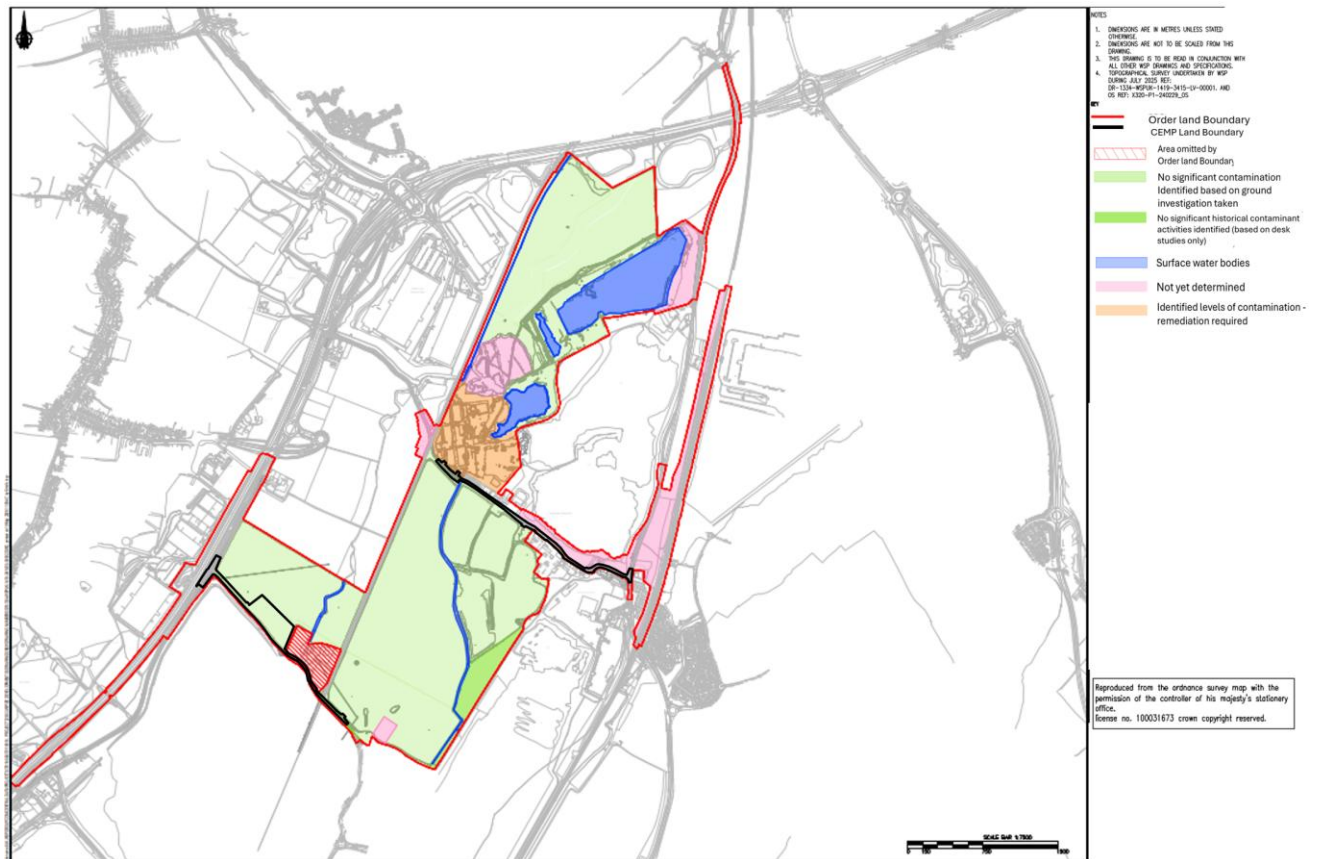
Land Contamination Statement Notice

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.

Figure N-1 - Contamination on CEMP Land



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 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 activities other than preliminary works are permitted in that area unless and until the relevant Condition 14 requirements have been satisfied.

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 WTN or Hazardous Waste Consignment Note, which must be retained for the required statutory period.
- N.i.2 Site won material can be re-used on the CEMP Land, subject to the re-use criteria presented in the Detailed Remediation Scheme and in accordance with suitable controls.
- N.i.3 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**;
 - Exposure to potential contamination for CEMP Staff will be mitigated through normal working practice using appropriate Risk Assessment Method Statement (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 hygiene and welfare facilities will be provided for the CEMP Works, including hand-wash facilities (hot/cold water, soap, and towels), designated clean welfare/eating areas, changing provisions with segregation of clean and potentially contaminated clothing/PPE, and boot-wash/cleaning points to prevent the spread of contamination.
 - 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 during inductions and via a toolbox talk by the CEMP Works Site Manager. Should a UXO be found then a specialist company will be employed to manage this;
 - Construction vehicles and plant will be regularly maintained and supplied with spill kits;
 - Provision of spill containment equipment such as absorbent material will be available within the CEMP Land;
 - Hazardous materials already present on 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 disposals of waste as set out in **Appendix I**. 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**). This includes measures associated with excavation from the landfill;
 - 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 of the excavations will 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 / consenting route, ensuring that contaminated water does not enter groundwater, surface water drains or any watercourse; and
- 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.3** for measures to protect waterbodies from contamination).

N.i.4 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.5 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.6 Further investigation and targeted testing in Pink Areas will be completed prior to the commencement of construction activities 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; and
- Orange Areas Control Approach – Works only in accordance with the detailed remediation scheme (available on request).

N.i.7 There are contamination risks that are expected to arise from the CEMP Works in the CEMP Land, as shown in **Figure N-1**, 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 earthworks on the CEMP Land, 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**, 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 Watercourse protection – enhanced controls
- Measures in this section are focused on preventing silt-laden or contaminated runoff, fuel/chemical pollution and concrete washout 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 **Section L**); accordingly, the temporary runoff interception/treatment measures set out in **Sections L** and **N** 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. earthworks adjacent to watercourses, dewatering, stockpiling near drainage pathways, refuelling/plant maintenance, and wheel washing).
 - Concrete/cement washout and washdown areas will be located at least 10m from any water body, watercourse, surface water drain, drainage outfall, or other surface water drainage feature (where present), and will be sited on contained/impermeable ground with measures to prevent discharge to ground, surface water drainage systems, or controlled waters.
- N.ii.3 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 arrangements will be implemented in accordance with the Governance, Command and Escalation section near the front of this CEMP 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;
 - Control and treatment measures will be inspected weekly by the Environmental Clerk of Works (EnvCoW) or a delegate to ensure they are working effectively;
 - Other than on screening berms/bunds, finished soil level gradients will be relatively shallow to slow down surface water runoff and reduce excessive mobilisation of loose soils. However, the CEMP Works Site Manager will ensure that CEMP Land levels will not be flat which could result in ponding and overly moist sub-soil; and
 - The earthworks will be kept free of water including arranging for rapid removal of water, lowering, and maintaining water levels in excavations to enable permanent works to be finalised.

iii Measures for Managing Concrete and Cement (Procedure)

- Washing out of any cement or concrete lorries will be carried out in a contained area as shown in **Appendix B**;
- Wash out of any cement or concrete lorries will not be discharged to receiving water environment or foul water sewer; and
- Settlement and re-circulation systems for water re-use will be incorporated, to minimise the risk of polluted runoff

iv Managing Wheel Cleaning Facilities (Procedure)

- Wheel cleaning within contractor-specific exit points / facilities inside the CEMP Land will be implemented by the Contractor. Any communal road cleaning, shared wheel-cleaning arrangements or track-out controls outside contractor-specific demises will be coordinated through the Transport Coordinator's logistics arrangements in force at the time, with delivery responsibilities allocated through the relevant site operating arrangements. The detailed boundary split will be agreed between the Contractor and the Transport Coordinator and reflected in CEMP Land operating arrangements.
- Wheel cleaning will be undertaken on all vehicles leaving the CEMP Land in the bunded hardstanding wheel wash area shown in **Appendix B(1) – Broadmead Road Compound (West Gateway Zone)**, 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;
- Wheel wash water will be contained within the wheel cleaning system and, where practicable, settled/filtered and reused as part of the wheel washing recycling arrangements described in **Section L**. Temporary sacrificial SuDS features will be used only to provide additional treatment/attenuation ("polishing") for any controlled overflow or residual runoff (where required), and will not be relied upon as a standalone recycling unit; and
- The Contractor will confirm the specific temporary sacrificial SuDS features required for the wheel cleaning arrangements (including inspection and maintenance frequency) as part of the temporary surface water controls for the CEMP Works, and will implement and maintain them in accordance with **Section L**.

v 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, water body, surface water drain/outfall, and overland flow path. 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 set out in the Governance, Command and Escalation section near the front of this CEMP.

O. NATURAL ENVIRONMENT

General CEMP Land Management

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

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** 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, concrete/cement washout, 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** and **Section N**, 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**, 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.
- Hedgerows, where retained, will be protected by measures including incorporation of an appropriate buffer (a minimum of 3m to the base of the hedgerow) between the retained hedgerow and CEMP Works activities, demarcated with appropriate protection fencing e.g. Heras fencing or similar;
- 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 The following measures will be carried out to manage the risk of spreading invasive non-native plant and animal species. Measures employed as part of the CEMP Works include:

- An ECoW will be appointed to oversee the invasive non-native species management;
- A pre-construction survey for Invasive non-native plant species will be completed in the active growing season (approximately April to August inclusive) prior to vegetation and site clearance commencing within any part of the CEMP Land. This will control for the potential spread of such species since baseline surveys for invasive non-native plant species were undertaken;
- Following the surveys, exclusion zones will be established around identified areas of invasive species;
- 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 a site with known invasive species; and
- Any removal of invasive species will adhere to good practice measures and summary of these is provided below.
- Biosecurity facilities including wheel wash stations and disinfectant equipment will be provided to prevent the spread of invasive non-native species;
- Mandatory toolbox talks detailing control measures held by the EnvCoW prior to any CEMP Works adjacent to any invasive non-native plant species;
- Defra's Check, Clean, Dry principles will be implemented for all plant, equipment, and PPE;
- Invasive non-native species contaminated material will be segregated and securely stored prior to removal to licensed facilities;
- Surveys have indicated the presence of Japanese Knotweed adjacent to Manor Road, which requires these mitigation measures to be adhered to;
- Establish a 7m 'no tracking/excavation' buffer around the Japanese knotweed stand where practicable;
- Do not move soil or plant material from the agreed buffer zone area to other parts of the Order land or outside the Order land without consulting a specialist contractor;

- Do not track machinery within the 7m buffer zone nor over the Japanese knotweed;
- Dedicated boots and tools in an invasive non-native species zone;
- Maintain 10m stand off to watercourses for storage of any invasive non-native plant species; prevent wash water discharge. Where temporary pumping or management of surface water is required, water will be controlled and treated in line with **Section N** to prevent the uncontrolled transfer of sediment or biological material. No active trapping, control, or removal of non-native fauna in surface waters is proposed or required as part of the CEMP Works.
- Avoid any ground disturbance where knotweed is present, unless for removal of the Japanese knotweed by a specialist contractor;
- Ensure any disposal of knotweed adheres to the following:
 - Is not disposed of with general soil or green waste;
 - Is not moved outside the Order land without appropriate permits and a registered waste carrier; and
 - Is disposed by a specialist at a licensed facility.

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 Where applicable, pre-commencement surveys will be undertaken by others to confirm the continued absence of protected or otherwise notable species and/or to inform detailed mitigation and/or licensing will be required where relevant to the part of the CEMP Land being affected, relating to the following species:

- Badger;
- Birds; and
- Reptiles.

O.ii.3 MHCLG will be notified if these pre-commencement surveys identify any of the listed species.

O.ii.4 Where pre-commencement surveys identify any of the listed species, the notification will include (as a minimum) confirmation of presence/likely absence, the location/extent relevant to the CEMP Works area, and the specific protection/mitigation measures to be implemented (including any required exclusions, supervision, or licensing/consents) before CEMP Works proceed.

Badgers

O.ii.5 Pre-construction surveys of known badger setts will be undertaken to confirm their continued use, as well as identifying any further setts that may have been dug by badgers in the intervening period. MHCLG will be notified with details of when these surveys take place and their results.

O.ii.6 A badger mitigation licence has been obtained from Natural England for the CEMP Works.

Schedule 1 Birds

- O.ii.7 Prior to any CEMP Works commencing, a pre-works check for nesting Schedule 1 bird species will be carried out on Potential Nest Sites (PNS) as agreed with the ECoW.
- O.ii.8 If a Schedule 1 bird species is identified during the pre-works checks, the ECoW will determine an appropriate course of action. If any active nests are recorded, to avoid the risk of intentional or reckless disturbance the ECoW will determine an appropriately sized buffer around the active nest.

Barn Owls

- O.ii.9 Should evidence of a PNS for barn owl be identified within 150m of the CEMP Works either during the pre-commencement surveys or during clearance works outside of the bird breeding season, then an ECoW will be contacted to undertake nest exclusion measures, and an alternative nesting site will be provided. If a barn owl PNS needs to be removed, compensatory nest sites would be provided as soon as practicable, and prior to the removal of the existing PNS.

Reptiles

- O.ii.10 Prior to commencement of CEMP Works, the ECoW will undertake a walkover survey, including hand searching where required, to identify any visible reptiles.
- O.ii.11 Mitigation measures to minimise the risk of harm to individual animals and avoid detrimental effects upon the local populations include the following:
- The identification and establishment of one or more translocation receptor area(s);
 - The trapping and translocation of reptiles from areas to be affected by the CEMP Works (where directed by the ECoW);
 - Destructive search methods (where directed by the ECoW; and
 - The creation and enhancement of habitat for reptiles where required.
- O.ii.12 Where translocation is required, the reptile receptor area(s) will be established within the CEMP Land in a location agreed by the Ecological Clerk of Works (ECoW). Artificial refugia (e.g. log piles) may be created within the receptor area(s) to provide shelter.

Amphibians (including great crested newt)

- O.ii.13 CEMP Works will proceed in adherence to the requirements in the District Licensing Scheme (DL) for Bedfordshire.

Terrestrial Invertebrates

- O.ii.14 If removal of any rubble, brash or log piles is required as part of the CEMP Works, then a Precautionary Works Method Statement (PWMS) will be employed. Prior to removal, a Toolbox Talk will be presented by the ECoW.
- O.ii.15 Mitigation will entail the careful clearance of suitable terrestrial invertebrate habitats. Where any deadwood habitat is removed, this will be retained and incorporated within the areas of proposed landscaping for the CEMP Works.

Additional Species of Principal Importance and Animal Welfare Considerations

- O.ii.16 The CEMP Land is anticipated to support Species of Principal Importance (SPI) including brown hare, hedgehog, and common toad. SPI are considered crucial for biodiversity conservation in the UK and listed under Section 41 of the *Natural Environment and Rural Communities (NERC) Act 2006 (England)*. Public bodies, including local authorities, have a legal duty to consider the conservation of these species when carrying out their functions. This includes taking actions to protect and enhance their habitats.
- O.ii.17 In addition to the 'General Site Management' measures above, mitigation for Species of Principal Importance (SPI) will comprise of the following measures:
- Ecological support from the ECoW will be required during animal burrow excavations and vegetation/site clearance activities; and
 - Animal burrows on-the CEMP Land will be inspected by the ECoW to confirm the likely absence of protected species or habitat, and then carefully excavated in a manner that allows animals to safely escape before CEMP Works commence.
- O.ii.18 Any potential existing refugia within the Order land (e.g. log piles) will be dismantled by hand and relocated to retained areas (aligned to **Section O.ii.1**).
- O.ii.19 CEMP Works will be temporarily halted if individual animals are encountered to allow the animal to disperse from the CEMP Land. If toads do not disperse from the CEMP Land, they will be carefully moved by hand by either the ECoW or an appointed Contractor representative, taking care to avoid any injury, and relocated to a suitable area in proximity.
- O.ii.20 Any activity related to SPI will be supervised by an ECoW to minimise the risk of harm to SPI, who will hand search vegetation for these species prior to clearance each day.

Monitoring

- O.ii.21 **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.22 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
Badger	Monitoring as stated in any Badger licence subsequently secured. Monthly monitoring will be required to confirm badgers have relocated to any artificial setts prior to construction. Monthly checking for new burrows for badgers or other burrowing animals within or adjacent to the CEMP Land extent. Monthly checks of implemented mitigation measures by an SQE.
Breeding birds	Monthly checks for breeding birds and of tree and habitat protection measures during the breeding season by an SQE.
Reptiles	Monthly checks for reptiles and of implemented mitigation measures by an SQE.

Feature	Construction Monitoring
Amphibians	Monthly checks of implemented mitigation measures by an SQE.
Terrestrial Invertebrates	Monthly checks of implemented mitigation measures by an SQE.
Additional Species of Principal Importance and animal welfare considerations	Monthly checking for new burrows for burrowing animals within or adjacent to the CEMP Land. Monthly checks of tree and habitat protection fences by an SQE. Monthly checks of implemented mitigation measures by an SQE.

iii Vegetation Retention Plan (Plan)

- O.iii.1 No vegetation clearance is proposed as part of these CEMP Works, as vegetation has been previously removed during the preliminary works. Therefore, a vegetation retention plan is not required.

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.
- O.iv.2 Although no tree removal forms part of the CEMP Works, retained trees and hedgerows in the vicinity of the CEMP Land that could potentially be affected by the works (for example by canopy proximity or root protection areas) will be identified prior to the relevant works commencing. Where protective measures are required, they will be implemented through demarcation / exclusion zones and other appropriate controls in substantial accordance with Reference Document 21 (Arboricultural Impact Assessment Report).
- O.iv.3 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) – Broadmead Road Compound (West Gateway Zone); Appendix B(2) – Manor Road Compound and B(3) Manor Road Laydown Area (Lake Zone).**

P. ROLES AND RESPONSIBILITIES (POLICY)

- P.i.1 The key governance and incident command roles for the CEMP Works are set out in the Governance, Command and Escalation section near the front of this CEMP. **Section P** and **Table P-1** define the wider environmental, technical and specialist competence requirements supporting delivery of the CEMP Works.
- 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.

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 ■ Has a thorough understanding of incident escalation processes in accordance with best practice, including appropriate stakeholder engagement.

Role	Role Description Relevant to this CEMP
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, 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, including appropriate stakeholder engagement.
The Contractor	- Ensuring that the CEMP Works proceed 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 - 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;

Role	Role Description Relevant to this CEMP
	■ Extensive experience in monitoring, reporting, and raising incidents; and ■ Has a thorough understanding of incident escalation processes in accordance with best practice, 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; ■ 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, including appropriate stakeholder engagement; and ■ Holds the Badger License and is the named licence ecologist or Accredited Agent.
Arboriculture Clerk of Works	■ 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, including appropriate stakeholder engagement.
Geo-environmental engineering	■ 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, including appropriate stakeholder engagement.

Role	Role Description Relevant to this CEMP
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, including appropriate stakeholder engagement.

Q. CONSTRUCTION TRAFFIC MANAGEMENT

This Section constitutes the Construction Traffic Management Plan (CTMP) for the CEMP Works, and sets out the requirements for access arrangements, routing, delivery management, monitoring, and governance.

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.

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**.

i Access Points from Public Roads (Plan)

- Q.i.1 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 used 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. It will also reduce vehicle queuing associated with an 'arrive anytime' approach. This will be procured, implemented, and managed by the Transport Coordinator/CLP in advance of CEMP Works commencing.
- 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 Transport Coordinator/CLP. Abnormal loads will require a minimum of seven days' notice.

SUPERVISED (SITE CONTROL AND GATEKEEPING)

- Q.ii.3 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.
- Q.ii.4 The locations of the Logistics Hub and Lorry Holding Area can be found in **Appendix B**.

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 and routes. Deliveries without a valid booking, risk being turned away and delivery data will be recorded.
- 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;
 - The route for construction traffic via Broadmead Road to the West Gateway Zone may only be used once a dedicated construction access to the West Gateway Zone has been completed and a signalised junction with Woburn Road is operational under Condition 17(2); and
 - The route for construction traffic via Broadmead Road to the Core Zone may only be used once a signalised junction with Woburn Road is operational under Condition 17(2) and a level crossing improvement scheme has been fully implemented in accordance with an endorsed Condition 18.
 - Route via Ampthill Road (to access East Gateway Zone), via Ampthill Road and Manor Road East (to access Lake Zone) for the remaining phases;
 - Once the new Woburn Road Roundabout, the West Gateway Roads and the new bridge over the Marston Vale Railway are complete, the primary access for construction traffic for the Core Zone and the West Gateway Zone will route this way via Woburn Road. Manor Road will remain as a secondary access; and
 - Once the A421 junction is complete, the primary access for construction traffic for the Core Zone and the West Gateway Zone will route this way via the A421. Manor Road will remain as a secondary access. If there is a delay to the A421 junction, construction vehicles will continue to Woburn Road Roundabout, listed in the third bullet above.
- Q.ii.10 Delivery routing will be controlled through the Transport Coordinator/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 are to be avoided due to weight restrictions and local agreements. These areas are shown in red hatching in **Figure Q-1** below.

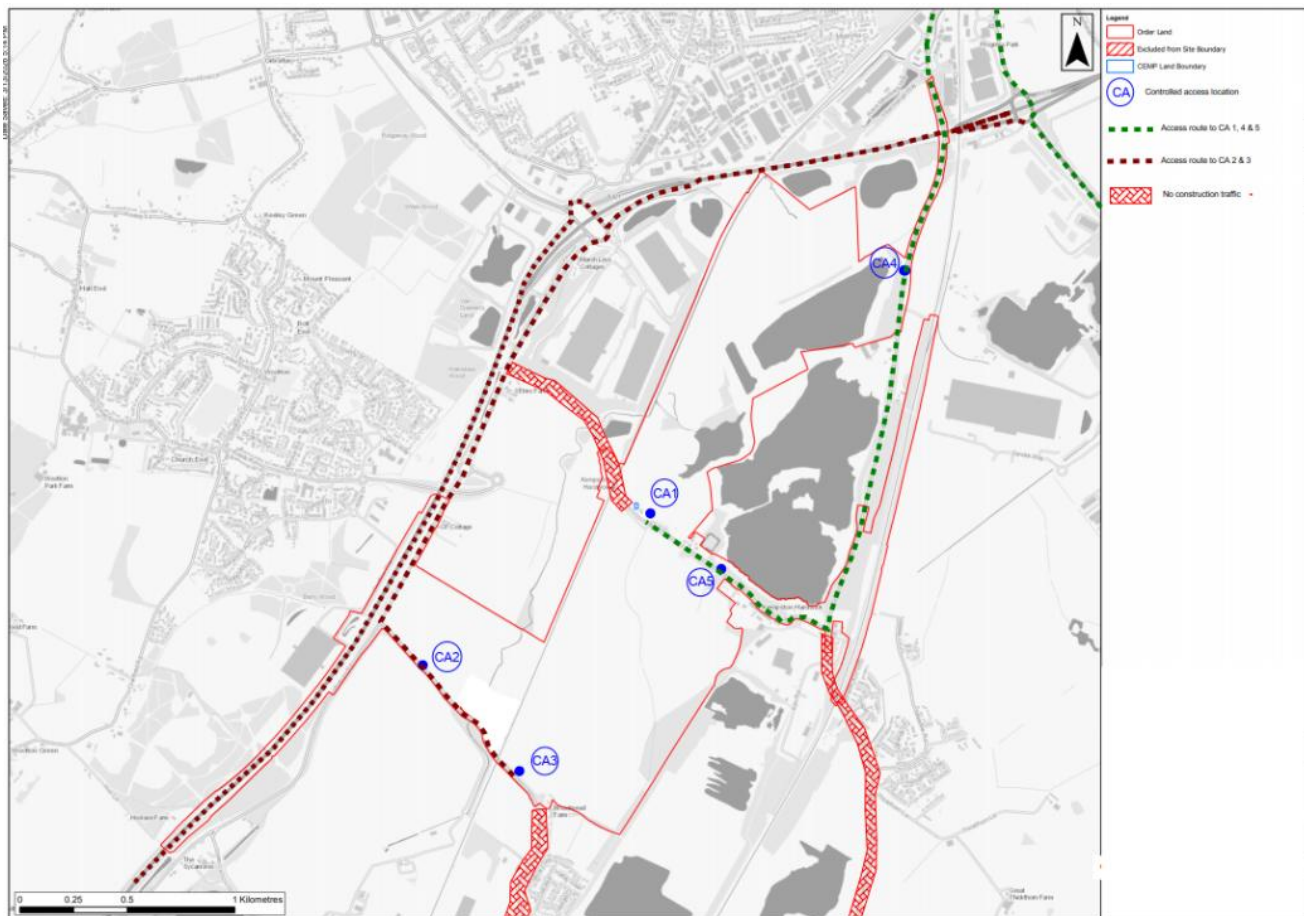


Figure Q-1: Access Arrangements for the CEMP Works

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 Transport Coordinator/CLP DMS.

MONITORED (RECORDING, REPORTING AND REVIEW)

Monitoring Report

- Q.ii.13 Forward booking data, movement forecasts and location / heatmap analysis will be used by the CLP/Transport Coordinator to identify potential pressure points, likely congestion periods, and areas of heightened risk of breach or non-compliance, enabling advanced mitigation measures and pre-emptive adjustments to routing, booking allocations, delivery timing, or site access arrangements to be implemented where necessary.

- Q.ii.14 In addition to notifying the CTMG of any breaches, every month the Contractor via their Transport Coordinator will prepare a monitoring report and submit it to the CTMG for review. The monthly reports will include the following for the previous month:
- 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 section will be through the TSG. Reviewing the results of the monitoring process is therefore essential to ensure that the 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 Transport Coordinator 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 (LHA)

- Q.ii.26 The Manor Road LHA will be used to temporarily hold deliveries until they are called forward to the relevant delivery zone. Whilst at the LHA vehicles and drivers will be subjected to CLOCS Checks and will be presented with the CEMP Land rules. Drivers will be expected to wait with their vehicles unless they are using the common user facilities WC's, smoking areas or rest areas established for the comfort and safety of LHA users.
- Q.ii.27 Additional Lorry Holding Facilities, including suitable rest areas shall be made available to the extent possible at each CA point. These facilities are to be positioned to ensure vehicles can escape.

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

- Q.iii.1 The routing phasing described in **Section Q.ii** applies to all construction-related vehicle movements associated with the CEMP Works, including construction worker 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

- Q.iii.2 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 workforce 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 Subcontractors 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.3 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.4 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.5 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.6 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.7 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.8 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 Q1 - Access Arrangements for the CEMP Works**.

HDV Route Compliance

- Q.iii.9 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.10 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.11 Arrangements for the removal of spoil or waste from the Order land will follow the procedure noted in **Paragraph I.ii.1**.
- Q.iii.12 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/Transport Coordinator 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 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.5 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.6 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.7 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.8 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.

Lorry Holding Area (LHA)

- Q.iv.9 The Manor Road LHA will be used to temporarily hold deliveries until they are called forward to the relevant delivery zone. Whilst at the LHA vehicles and drivers will be subjected to CLOCS Checks and will be presented with the CEMP Land rules. Drivers will be expected to wait with their vehicles unless they are using the common user facilities WC's, smoking areas or rest areas established for the comfort and safety of LHA users.
- Q.iv.10 Additional Lorry Holding Facilities, including suitable rest areas shall be made available to the extent possible at each CA point. These facilities are to be positioned to ensure vehicles can escape.

Timing of Deliveries

- Q.iv.11 HDV deliveries will occur during the permitted construction working hours as set out in **Section B**. 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 Qiv**);
 - 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 **Paragraph 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 worker 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 & rides, public car parks;
 - Use of existing park & ride facilities;
 - 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 people 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, workers 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 encouraging the use of and suggesting measures for sustainable worker transportation 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 this 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 **Section N.iv** outlines the mitigation measures implement to prevent the deposit of mud and other deleterious material on roads surrounding the CEMP Works.
- Q.vii.2 All vehicles used for construction will be compliant with CLOCS standards.

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 Any CEMP Works within the Network Rail (NR) interface area, or which could affect NR assets (including track, structures, drainage, lineside fencing, signalling/telecoms, overhead line equipment where present, and level crossings), will be planned and executed in accordance with NR requirements and approvals. Any changes to such CEMP Works will be require agreement with NR prior to implementation. Where required by NR, NR-approved Works Package Plans (WPPs) will be produced and implemented, setting out the agreed scope, method, access arrangements, exclusion zones, monitoring requirements, emergency arrangements, and roles/responsibilities. WPPs will be developed and submitted in accordance with the works programme to allow for NR and Promoter review and acceptance periods.
- Q.ix.2 Examples of measures that may be included in NR-approved Works Package Plans (or alternative agreed Safe Systems of Work) include:
- Defined access/egress routes and exclusions;
 - Plant height and stand-off restrictions;
 - Fencing/demarcation and signage;
 - Temporary works approvals;
 - Interface supervision/attendance requirements; emergency arrangements; and
 - Monitoring/inspection requirements for rail assets and interfaces.
- Q.ix.3 Where NR determines that a WPP is not required but there remains potential to affect NR assets, the Contractor will implement a NR-agreed Safe System of Work (SSoW) and will coordinate with NR to agree the appropriate level of NR supervision and/or attendance. This will include, where relevant, controls for traffic management interfaces (including any risk of vehicles approaching or crossing a level crossing), plant operating restrictions and defined stand-off distances from NR assets.

- Q.ix.4 No CEMP Works will commence within the NR interface area unless the required NR approvals/acceptances (WPP or alternative agreed SSoW) are in place, the CEMP Staff have been briefed, and the relevant exclusion zones and demarcations have been established.
- Q.ix.5 Any changes to planned CEMP Works that could affect NR assets (including changes to traffic management extents near the railway) will be subject to change control and will be agreed with NR prior to implementation.

R. GREENHOUSE GAS (PROCEDURE)

- R.i.1 To minimise the impacts from GHG emissions for the CEMP Works during the CEMP Period, opportunities to reduce carbon will be implemented in line with the Carbon Reduction Hierarchy from PAS 2080:2023 (Carbon Management in Buildings and Infrastructure). Examples include, but are not limited to:
- Using Euro 6 compliant construction plant and delivery vehicles;
 - Transportation of materials to be optimised to minimise GHG emissions, including sourcing construction materials from local suppliers, making use of local waste management facilities where practicable and ensuring the construction programme considers requirements for within the Order land storage of materials and waste; and
 - Construction waste to be recycled or reused where practicable to avoid disposal to landfill, including the reuse of excavated arisings within the Order land, where suitable.
- R.i.2 Record keeping and reporting
- A proportionate record of GHG reduction actions and related evidence will be maintained for the CEMP Works. This will include, as a minimum, an actions/evidence log and supporting source records (e.g., plant register, fuel/energy records where available, delivery booking data, and waste transfer/management records). Summary updates will be captured through routine project reporting.

OTHER MATTERS (PROCEDURE)

Cultural Heritage and Archaeology

This section is omitted because the CEMP Works do not affect the Kempston Hardwick moated site.