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INVASIVE NON-NATIVE SPECIES PLAN

ACRONYMS

Term	Definition
ACM	Asbestos Containing Materials
AIL	Abnormal Indivisible Load
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
CMC	Controlled Modulus Columns
COSHH	Control of Substances Hazardous to Health
CTMP	Construction Traffic Management Plan
dB	Decibel
DL	District Licensing Scheme
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

Term	Definition
EPSML	European Protected Species Mitigation Licence
ES	Environmental Statement
GDTE	Groundwater Dependent Terrestrial Ecosystems
GHG	Greenhouse Gas
GPS	Global Positioning System
H&S	Health and Safety
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
IBCs	Intermediate Bulk Containers
ILP	Institution of Lighting Professionals
INNS	Invasive Non-native Species
LGV	Light Goods Vehicle
LHA	Lorry Holding Area
LMP	Lighting Management Plan
MCERTS	Monitoring Certification Scheme
MEWP	Mobile Elevating Work Platform
MHCLG	Ministry of Housing, Communities and Local Government
NH	National Highways
NR	Network Rail
NSRS	Noise Sensitive Receptor
NVIA	Noise and Vibration Impact Assessment
OS	Ordnance Survey
OSC	Operational Support Centre
PAS	Publicly Available Specification
PNS	Potential Nest Sites

Term	Definition
PPE	Personal Protective Equipment
PPG	Pollution Prevention Guidance
PPV	Peak Particle Velocity
PWMS	Precautionary Works Method Statement
RAMS	Risk Assessments and Method Statement
SDO	Special Development Order
SMP	Soil Management Plan
SMS	Short Message Service
SOP	Standard Operating Procedure
SPI	Species of Principal Importance
SQE	Suitably Qualified Ecologist
SRN	Strategic Road Network
SSoW	Safe System of Work
SuDS	Sustainable Drainage Systems
TC	Transport Coordinator
CTMG	Transport Steering Group
UKAS	United Kingdom Accreditation Service
UXO	Unexploded Ordnance
WC	Water Closet
WPP	Works Package Plans
WTN	Waste Transfer Note

DEFINITIONS

Term	Definition
Construction Environmental Management Plan (CEMP)	A CEMP Land specific document outlining how a developer will manage and mitigate environmental impacts during construction
CEMP Works	The scope of works covered by this CEMP
CEMP Land	The boundary of the part of the Order land on which the construction work to which the CEMP relates.
CEMP Staff	Construction workers and other staff involved in the CEMP Works
CEMP Period	The period in which the CEMP Works will be delivered
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
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.

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	Is this CEMP within substantial accordance with Ref Document 9 (Outline CEMP)
Scope, Governance, Command and Escalation	X					X
A. General Management Processes	X					X
B. Construction Working Hours	X					X
C. Engagement with the Neighbouring Residents	X					X
D. Noise and Vibration	X					No, this section is not in substantial accordance with Ref Document 9. The CEMP Works have been assessed in Appendix F with the assessment showing no significant noise and vibration will be generated by the CEMP Works. Elements of Ref Document have not been considered proportionate for this section. Trigger and action levels alongside mitigation have been included to ensure significant effects do not occur.

E. Control of Dust and other Emissions to Air	X					No, this section is not in substantial accordance with Ref Document 9. The CEMP Works have been assessed in Appendix G with the assessment showing no significant dust generation or other air emissions by the CEMP Works. Elements of Ref Document 9 have not been considered proportionate for this section. Trigger and action levels alongside mitigation have been included to ensure significant effects do not occur.
F. Material Storage Management (Method Statement)	X					X
G. Soils Management	X					X
H. Arrangements for Site Welfare, Fencing and Construction Equipment and Plant	X					X
I. Construction Waste Management	X					X
J. Construction Lighting Management (Procedure)	X					X

K. Strategy for Piling Operations and Associated Risk Assessment (Method Statement)	X					X
L. Management of Surface Water	X					X
M. Assessment of Potential Contamination Risk from CEMP Works (Policy)	X					X
N. Contamination Prevention and Control	X					X
O. Natural Environment	X					No, this section is not in substantial accordance with Ref Document 9. The CEMP Works does not require vegetation removal therefore it is not proportionate to include the same level of assessment and measures as Ref Document 9.
P. Roles and Responsibilities (Policy)	X					X
Q. Construction Traffic Management	X					X
R. Greenhouse Gases (Procedure)	X					X

Other Matters (Procedure)			X		CEMP Works do not affect the Kempston Hardwick moated site and do not require separate cultural heritage/archaeology procedures beyond the relevant enabling conditions and separate submissions.	X
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SCOPE, GOVERNANCE, COMMAND AND ESCALATION

Introduction

This Construction Environmental Management Plan (CEMP) describes the environmental management measures that will be implemented during the West Gateway Zone CEMP Works associated with 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 (OCEMP)) and has been tailored to the scale, duration, location, and risk profile of the CEMP Works. Accordingly, this CEMP should be read as a proportionate, works-specific application of the OCEMP to the Mass Grading CEMP Works (CEMP Works).

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

Key Incident and Site Governance Roles (Policy)

For the purposes of incident response during the CEMP Works, the command/decision-making hierarchy is:

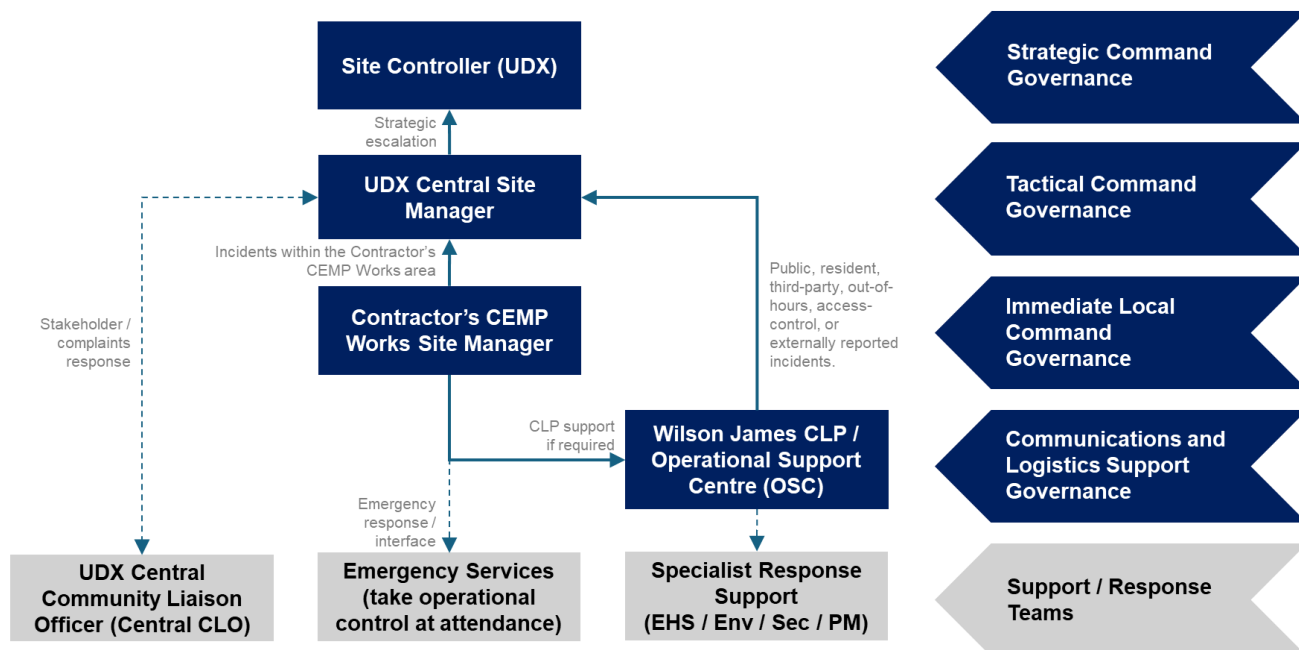
- Contractor's CEMP Works Site Manager – local decision-maker;
- Promoter's Central Site Manager – tactical decision-maker; and
- Site Controller – strategic decision-maker.

Response teams and support functions include:

- The Construction Logistics Provider (CLP);
- The Operational Support Centre (OSC);
- The Central CLO;
- Emergency Services, and
- Specialist Response Support.

These roles support incident reporting, the agreed notification and call-out process, external and third-party communications (including where relevant with organisations such as National Highways and Network Rail), and technical response, but do not replace the command hierarchy.

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



The Response and Specialist Support functions include appropriately qualified and experienced specialist advisers from the professional team and client team, including:

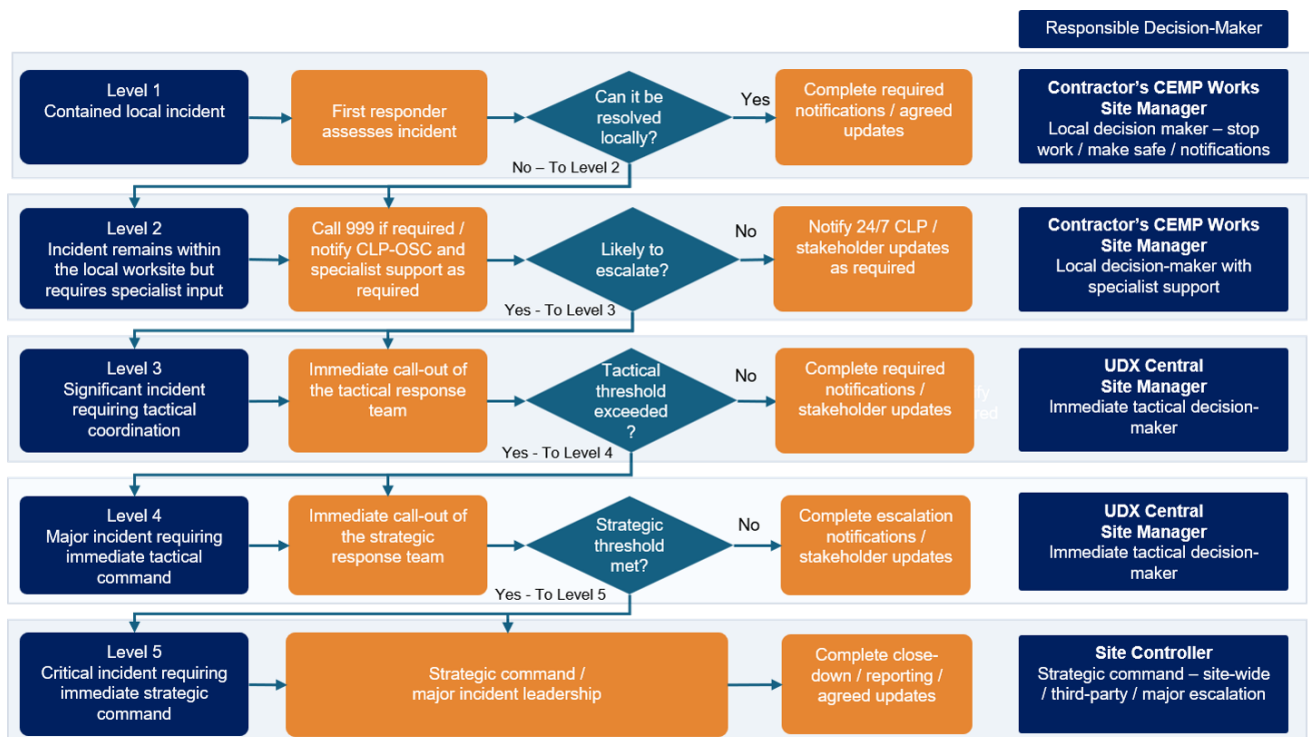
- Health & Safety – supports the responsible decision-maker on casualty response, worker safety and site safety measures, and coordinates H&S-related response actions, access and communications where required;
- Environment – supports the responsible decision-maker on spill, pollution, drainage and regulatory response, and coordinates environment-related response actions where required;
- Security – supports the responsible decision-maker on threat response, access control, perimeter management, and secondary-site security, and coordinates the relevant security response where required; and
- Project Management/Quality Management – advises on project interfaces, programme/recovery implications, compliance, assurance, records, and verification requirements.

These functions provide specialist advice to the responsible decision-maker and, within their respective remit, implement and coordinate the resulting response actions. They do not replace the command/decision-making hierarchy.

Regardless of the nominal incident level, any incident involving actual or potential loss of life, rail infrastructure, live utility strike, gas main damage, major pollution, watercourse impact, hostile act, or simultaneous/concurrent incidents shall be escalated immediately through the command hierarchy, with immediate notification to the Promoter's Central Site Manager (Central Site Manager) and, where strategic command is required or cannot be excluded, to the Site Controller.

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

CEMP Works Incident Escalation and Command Procedure



Incident escalation is determined by consequence, immediacy, specialist risk, and concurrent events, not solely by the physical extent of the incident.

Call 999 immediately for any incident involving actual or suspected risk to life, serious injury, fire, violence, hostile act, crime in progress, collapse, or another emergency requiring urgent external attendance. Where there is doubt, the safer course is to call 999 and then continue internal escalation.

For each escalation stage, the role shown is the responsible decision-maker for that stage. If that person is unavailable within the time required, authority shall pass to the designated deputy or next available command role until responsibility is formally handed over. CLP/OSC, the Central CLO, Emergency Services and Specialist Response Support provide reporting, communications, and function-specific response support, but do not replace the command hierarchy.

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

Emergency Response (Procedure)

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.

This CEMP sets the governance, command, and escalation framework for the CEMP Works. It is the project's policy that this governance framework is supported by the separate Project Incident Response Plan Health & Safety Plan, which sets out the detailed incident response procedures,

including scenario-specific response plans, immediate response actions, reporting templates, contact details for each relevant role, contact / notification cascades, and incident-specific role allocations.

The 24-hour OSC provides call handling, incident logging, reporting and notification/call-out support. It does not replace the Contractor's local operational control, the Promoter's Central Site Manager's tactical role, or the Site Controller's strategic command role.

Emergency Command Structure

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 Principles set out in this section.

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.
The Promoter's Central Site Manager (Central Site Manager)	■ Refer to Table A-3	■ Tactical coordination and escalation across affected work areas.
Contractor's CEMP Works Site Manager	■ Refer to Table A-3	■ Local operational control, stop-work, make-safe actions, and initial notifications.
Wilson James OSC (OSC)	■ Refer to Table A-3	■ Call handling and incident reporting
Wilson James CLP	■ Refer to Table A-3	■ Contact cascade and logistics support following initial OSC reporting; not incident command.
The Promoter's Central Community Liaison Officer (Central CLO)	■ Refer to Table A-3 and Paragraph C.i.1	■ Stakeholder, resident, and external communications lead.
Contractor Community Liaison Officer (Contractor CLO)	■ Refer to Table A-3 and Paragraph C.i.3	■ Supports local communications and feeds issues into central arrangements.

The wider environmental, technical and specialist role descriptions are set out in **Table A-3** and **Section P**.

Incident Escalation Principles (for the purposes of the CEMP Works)

Incident severity and escalation level for the CEMP Works shall be determined by consequence, immediacy, specialist risk, concurrent events, and wider impact — not solely by the physical extent of the incident.

Regardless of the nominal incident level, any incident involving actual or potential loss of life, rail infrastructure, live utility strike, gas main damage, major pollution, watercourse impact, hostile act, or simultaneous/concurrent incidents shall be escalated immediately to the level of command required to control the consequences.

- **Level 1: Minor Incident** – Minor environmental impact/non-serious health and safety incident that is contained and manageable within a single CEMP Works area through local contractor control. Examples may include a small amount of fuel spillage on a tarmacked area or a CEMP Staff trip/fall.
- **Level 2: Local Incident** – Moderate environmental impact/health and safety incident that requires notification and coordinated oversight beyond the immediate work area. Examples may include a small-scale fire or an injury to a member of CEMP Staff that results in CEMP Works stopping momentarily.
- **Level 3: Significant Incident** – Significant environmental/health and safety incident that requires tactical coordination, specialist input, and/or a coordinated response across affected work areas. Examples may include contamination of a waterway or an accident to a member of CEMP Staff resulting in hospitalisation.
- **Level 4: Major Incident** – Major environmental/health and safety incident that requires strategic escalation because of actual or potential major safety, environmental, security, infrastructure, public-interface, or reputational consequences. Examples may include adverse dust impacts on neighbouring residential areas or an accident leading to hospitalisation of numerous members of CEMP Staff.
- **Level 5: Critical Incident** – Critical environmental/health and safety incident that represents an actual or imminent critical event requiring immediate strategic command, potential evacuation/Order land closure, emergency-service interface, or urgent measures to preserve life, protect the public, or control severe consequences. Examples may include large-scale fires requiring evacuation both within and outside Order land, or an accident resulting in one or more fatalities.

The following indicative response timings apply to escalation and decision-making-under the Incident Escalation and Command Procedure.

Implied Timings	Clause
Immediate where required	For any incident involving actual or potential loss of life, evacuation, major environmental release, security threat, critical infrastructure risk, or other Level 4 / 5 consequence, tactical and/or strategic command shall be stood up without delay.
0 – 5 mins	Identify the incident, stop work if needed, make the area safe as far as reasonably practicable, determine the initial incident category, and call 999 where the emergency threshold is met.
5 – 15 mins	Confirm the responsible decision-maker, establish local / tactical control as required, start the internal call-out, and issue the first situation report where appropriate.
15 – 30 mins	For incidents that remain live after initial control measures, review whether tactical or strategic escalation is required and formalise the command structure, as necessary.
Every 30 mins	Review/update cycle while incident remains live.
Within 2 hours of the incident closedown	Internal incident report completed.
Within 24 hours of incident closedown	Formal major incident announcement where required.

For the purposes of this CEMP:

- Local means control of the incident within the Contractor's CEMP Works area;
- Tactical means coordination of the response across affected work areas, interfaces, contractors, support functions, and external contacts as required; and
- Strategic means command of major or critical incidents with site-wide, third-party, regulatory, reputational, or major programme implications.

Detailed incident scenarios, response actions, and role-specific procedures are set out in the separate Project Incident Response and Health & Safety Plan.

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 In accordance with Condition 12(9) of the SDO, the Site Controller will take an active role in the governance, escalation, and coordination of

potential cumulative impacts across the Order Land as a whole. The Site Controller will act to avoid/minimise/mitigate cumulative impacts that may arise due to concurrent CEMP Works from distinct/separate CEMP Land parcels so far as reasonably practicable. The Site Controller will use their discretion and best judgement to address cumulative impacts which may occur on Order Land.

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).

The process for effectively managing cumulative impacts is discussed in the **OTHER MATTERS (PROCEDURE) Section** at the end of this CEMP.

A. GENERAL MANAGEMENT PROCESSES (PROCEDURE)

i Procedure for Audits and Inspections

- A.i.1 Responsibilities related to inspections and audits have been provided in **Table A-3**. Each follow-up inspection will begin with a review of outstanding actions from previous reports to confirm their completion.
- A.i.2 Internal environmental inspections and audits will be undertaken regularly during the CEMP Period. Routine inspections of CEMP Land will be conducted to ensure that environmental control measures are being effectively implemented. These inspections will apply the measures set out in this CEMP as the baseline for compliance. Any identified non-compliances and associated corrective actions will be recorded.
- A.i.3 Actions to resolve these non-compliances will be recorded and delegated by the Contractor to the relevant responsible parties. Material non-compliances, repeated non-compliances, or issues with the potential to affect third parties, programme, reputation, or compliance will be escalated to the 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.
- A.i.4 Responsibilities related to inspections and audits have been provided in **Table A-3**. Each follow-up inspection will begin with a review of outstanding actions from previous reports to confirm their completion.

To adhere to the above, inspections will cover the following key areas during the CEMP Period:

- Audits will be carried out in accordance with details listed in this CEMP and contractual obligations (including any of The Promoter's Contractor Environmental Health and Safety Rules and Responsibilities documentation) to confirm that:
 - CEMP Works are progressing in accordance with the agreed method statements;
 - Agreed protection or mitigation measures are in place, prior to or during the implementation of CEMP Works; and
 - CEMP Works have been completed in accordance with the design and commitments made during the statutory process.

- A.i.5 Audits will be undertaken on a weekly basis throughout the CEMP Period.

Monitoring

- A.i.6 The Environmental Manager will have responsibility for maintaining a register of all required environmental monitoring related the CEMP Works, which will at all times be made available for auditing and inspection.

Environmental Issues

- A.i.7 Environmental issues not adhering to the CEMP Land's environmental standards as outlined in this CEMP that are identified either during audits or inspections, or that become apparent during the normal course of construction, will be recorded by the Contractor in an environmental tracker and

communicated to the Site Controller. Any required actions will be carried out and closed out within an appropriate timeframe.

A.i.8 Dissemination of information on environmental issues will take place as follows:

- Meetings to discuss particular CEMP Works issues;
- Method statements;
- Task/activity briefings;
- Toolbox talks;
- Inductions;
- Environmental notices; and
- Environmental alerts.

A.i.9 Records that these have been carried out will be recorded on briefing registers.

A.i.10 The Environmental Manager will ensure policies and procedures displayed on the CEMP Land notice boards (including the current incident/emergency/complaints contact details and governance arrangements) (refer to **Paragraph C.ii.1**) are up to date. Supervisors will also be notified of any legislation changes which may affect working practices within the CEMP Land.

Reporting

A.i.11 Reporting procedures, as shown in **Table A-1** below, have been defined by the Site Controller who will have ultimate responsibility for the environmental performance of the CEMP Works. A performance report for the CEMP Works will be issued on a weekly basis to the Site Controller. This report will include a summary of environmental inspections conducted, audits completed, any complaints, issues or environmental incidents recorded, the action taken to resolve the complaint, issue or environmental incident, and the date when the complaint, issue or environmental incident is closed out.

Table A-1 - Reporting Requirements

CEMP Ref	Report	Frequency	Responsibility
A.i.1	Regular internal environmental inspections (including Waste Audits).	During 'high environmental risk' activities of the CEMP Works. These may include, but are not limited to, the following: <ul style="list-style-type: none"> ▪ Excavation high risks include but not limited to, falls from height, plant overturning, plant collisions, and slope failures; ▪ Mass grading; and ▪ Works adjacent to protected habitats. 	Contractor's Environmental Manager/EnvCoW (or delegate), with oversight by the Central Site Manager and Contractor.

CEMP Ref	Report	Frequency	Responsibility
A.iv.7	Reports covered in Environmental Incident Response Plan	As required	Contractor's Environmental Manager
C.i.3	CLO Reports.	Weekly.	Contractor CLO.
Scope, Governance, Command and Escalation of the CEMP Works	OSC Incident Report.	Whenever a complaint, incident or emergency is reported to the OSC Control Room.	OSC Control Room call recipient/reporting point
C.ii.2	Project Complaints Register.	After a complaint is received.	Construction Logistics Partner.
D.ii.4	Vibration Trigger Exceedance.	After trigger levels are exceeded.	CEMP Works Site Manager, with escalation to the Central Site Manager.
E.ii.3	Daily Dust Inspections.	Daily.	CEMP Works Site Manager and Central Site Manager
L.iv	Elstow Brook Monitoring Record	Within 2 months of commencement of the CEMP Works and every 3 months thereafter during the CEMP Period	Contractor's Environmental Manager/EnvCoW, with oversight by the Central Site Manager
Q.ii.13	DMS Reporting.	When any breaches of the HDV upper limits occur.	Transport Coordinator.
Q.ii.14	Transport Coordinator Monitoring Report.	Every month	Transport Coordinator.
Q.ii.18	Monitoring Results Report.	Every month	Transport Coordinator.
Q.ii.22	CTMG Learning Reports.	Following an incident related to construction traffic.	Relevant undertaker via their Transport Coordinator.
Q.ii.19	CTMG Feedback Report.	Following quarterly CTMG meetings.	Relevant undertaker via their Transport Coordinator.
Q.ii.23	CTMG Breach Report.	If requirements of the CTMP are not being met.	Relevant undertaker via their Transport Coordinator.

Internal Communication

- A.i.12 Internal communication on environmental issues will take place through face-to-face conversations, email, telephone, and regular environmental meetings chaired by the Central Site Manager and attended by all relevant environmental team members. **Table A-2** below summarises the meetings required to satisfy the environmental conditions of the CEMP Works.

Table A-2 - Meeting Requirements

CEMP Ref	Meeting	Frequency	Responsibility	Description
A.i.8	Environmental Issues.	Weekly.	CEMP Works Site Manager.	Meetings to discuss particular CEMP Work issues, method statements, task/activity briefings, toolbox talks, inductions,

CEMP Ref	Meeting	Frequency	Responsibility	Description
				environmental notices, and environmental alerts.
Q.ii.1	CTMP Kick Off Meetings.	CEMP Works Inception	Contractor	Reminder of the Contractors' standards and expectations as set out in contract documentation.
Q.ii.19	CTMG Meetings:	Quarterly	Contractor via their Transport Coordinator	Discuss monitoring report and agree any refinements to the CTMP.

ii Competence, Training and Awareness (Procedure)

A.ii.1 All CEMP Staff will complete corporate, CEMP Land specific, and environmental inductions prior to commencing work, covering health, safety and environmental requirements, CEMP Land –specific risks, environmental sensitivities, and mitigation measures. Ongoing competence is maintained through regular toolbox talks, specialist training where required, and refresher training triggered by certification expiry, regulatory change, or audit outcomes. Training topics relevant to the CEMP Works include:

- Tree Protection
- Japanese Knotweed
- Bats
- Badgers
- Slow Worms
- Birds
- Otters
- Spill Control
- Petrol, Diesel, and Oils
- Re-Useable Soil Resources within the CEMP Land
- Stripping Topsoil
- Stripping Sub-soil
- Stockpiling Soil
- Spreading Soil
- Dust and Air Quality
- Noise and Vibration
- Materials Management and Housekeeping
- Energy Conservation – Construction Good Practice
- Waste Management
- Storage of Waste
- Waste Segregation

- Water Pollution Prevention
- Water Pollution – Silt
- Pumping and Over-pumping
- Washing Down Plant and Machinery
- Climate Change
- Construction Carbon Reduction
- Road Sweepers

- A.ii.2 Competencies, qualifications, licences, and training records are centrally recorded and managed through the Contractor. Records are maintained electronically, reviewed periodically, and subject to internal audit, providing assurance that personnel remain suitably qualified and competent throughout the CEMP Period.
- A.ii.3 CEMP Staff development and performance are managed through continuous monitoring, supervision, and compliance checks. Where competency gaps or non-conformances are identified, corrective actions are implemented promptly, including retraining where necessary, to ensure ongoing compliance with environmental, health and safety, and project-specific requirements.
- A.ii.4 Roles and responsibilities related to the environmental management of the CEMP Works of the Site Controller and Principal Contractor during the CEMP Period are identified in line with **Table A-3**. These roles will be performed by a combination of personnel and team structures. Note that roles and responsibilities of persons with suitable qualifications and experience to carry out, or advise on, other matters relating to the CEMP Works are defined in **Section P: Roles and Responsibilities**.

Table A-3 - Roles and Responsibilities

Role	Responsibility
SITE CONTROLLER RESPONSIBILITIES	
Site Controller (or Designated UK Site Controller)	<ul style="list-style-type: none"> ■ Acts as the strategic command lead for incidents and emergencies where escalation beyond the local or tactical response is required. ■ Makes decisions relating to site-wide impacts, evacuation, closure, and engagement with external authorities where required. ■ Provides senior oversight of compliance with the endorsed CEMP and SDO requirements.
The Promoter's Central Site Manager (Central Site Manager)	<ul style="list-style-type: none"> ■ Acts as the tactical decision-maker/escalation lead for the CEMP Works, receiving escalations from the Contractor, CLP, and community interface arrangements. ■ Coordinates the response at the interface between the CEMP Works and other affected work areas. ■ Defines and oversees the reporting, escalation, and coordination framework for the CEMP Works.
Wilson James Construction Logistics Provider (CLP)	<ul style="list-style-type: none"> ■ Provides logistics coordination, call handling, incident logging, reporting support, and out-of-hours contact arrangements.

Role	Responsibility
	<ul style="list-style-type: none"> ■ Supports implementation of traffic, access, communal logistics, delivery management, and incident reporting systems. ■ Supports implementation of site-wide security control, monitoring, and response. ■ Supports the agreed notification and call-out process, community complaints/external contact routes, and the reporting of key contractor coordination information. ■ Supports site-wide inductions, initial delivery/access-control checks, and shared logistics/communal control arrangements where applicable. ■ Does not replace the local, tactical, or strategic command/decision-making roles set out in the Governance, Command and Escalation section.
The Promoter's Central Community Liaison Officer (Central CLO)	<ul style="list-style-type: none"> ■ Leads resident, adjoining landowner and stakeholder communications relating to the CEMP Works. ■ 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)	<ul style="list-style-type: none"> ■ 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	<ul style="list-style-type: none"> ■ 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 CEMP Works area; and

Role	Responsibility
	<ul style="list-style-type: none"> Acts as the local decision-maker for the CEMP Works area, implementing stop-work, make-safe actions and the required initial notifications.
Contractor's Environmental Manager (Environmental Manager)	<ul style="list-style-type: none"> Provide input to manage and mitigate environmental impacts during the CEMP Period; Advise and coordinate high risk environmental areas of the CEMP Works; Coordinate and manage the permitting and consents; and Implementing the CEMP.
Contractor CLO	<ul style="list-style-type: none"> Working with the CLP to act as the first point of contact for members of the public, recording relevant information such as the date and contact information associated with an in-person complaint/concern on a standard form and place a copy in a CEMP Works complaints register; and Ensuring 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)	<ul style="list-style-type: none"> 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 the CEMP period along with the EnvCoW.
Transport Coordinator	<ul style="list-style-type: none"> Delivering and monitoring the construction traffic management measures outlined in the Section Q; and, Monitoring vehicle and active travel access to the CEMP Land.
Waste Manager	<ul style="list-style-type: none"> Acting as a Waste Champion who will enforce the requirements set out in Appendix J: Construction Waste Management Plan, set waste targets and monitor all waste movements within the CEMP Land and final disposal if regulated waste outside the Order land.
24-hour OSC Control Room Call Recipient	<ul style="list-style-type: none"> Receiving calls for incident reporting and emergencies plus those requiring out of hours response; and Compile a report of an incident and then an Incident Notification.

iii Behavioural Standards for CEMP Staff (Standard)

- A.iii.1 The Promoter will implement a Worker Code of Conduct designed to set clear expectations for the behaviour of all workers, whether within the CEMP Land, or in the local community. It will be the responsibility of the Contractor(s) to make sure its workers adhere to the code of conduct. The Worker Code of Conduct will be issued and briefed to all CEMP Staff as part of the mandatory CEMP Works induction (and included within the induction materials), delivered by the Contractor,

and supported by the CLP 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 is expected to:
- a) Have due respect to their own safety and the safety of others by complying with all applicable laws, rules, and regulations including the Promoter’s processes and procedures;
 - b) Be ambassadors for the Promoter through behaviours and actions both on and off 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 on or off 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 Order land;
 - e) Ensure no damage of any kind is caused to property on and off CEMP 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 From time to time the Code will be re-enforced through communication mechanisms such as toolbox talks, the worker incentive and general communication networks highlighting positive engagement by workers in the community.
- A.iii.6 It is of the highest importance that the Code is respected by CEMP Staff at all levels. If someone acts in ways that are contrary to this Code, at least one of the following should be actioned:

- In the first instance discuss the person's behaviour with your immediate supervisor or line manager; and
- Raise the matter with the relevant employer's human resources team who will investigate the complaint and, if appropriate, will follow their company disciplinary procedure which could lead to removal from the Authorised Development and potentially dismissal.

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

- A.iv.1 All CEMP Works will be subject to task- specific risk assessments and method statements (RAMS), which will identify foreseeable risks and define appropriate control measures, including safety systems of work, competent supervision, permit- to- work systems and physical safeguards.
- A.iv.2 Higher risk CEMP Works such as work at height, operation of mobile plant, asbestos-related works, excavation, utilities diversions, work adjacent to live carriageways, plant operations and temporary traffic management interfaces on the CEMP Land will be supervised by competent personnel and undertaken only by trained operatives.
- A.iv.3 CEMP Staff safety is further protected through mandatory adherence to CEMP Land rules, behavioural standards and environmental responsibilities as established in **Section Aiii**. All personnel will receive a CEMP Works induction covering procedures set out in this CEMP, emergency arrangements, and key risks, which include:
- Impacts to protected species;
 - Asbestos;
 - Manual handling;
 - Working at height;
 - Working proximally to live rail infrastructure; and
 - Working near water.
- A.iv.4 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 Order land, visible management presence, and ongoing health and safety campaigns, ensuring that CEMP Staff are informed, and encouraged to raise concerns from any observations of near-misses or other proactive health and safety suggestions.
- A.iv.5 The Contractor will ensure adequate first aid provision will be maintained at all times, with trained first aiders available within the Order land and the nearest Accident and Emergency facility identified and communicated to CEMP Staff. Emergency arrangements, including fire response, evacuation procedures and access for emergency services, will be clearly displayed and regularly communicated, with subcontractors required to include task-specific rescue arrangements within their method statements.
- A.iv.6 If an incident is to occur, the response will adhere to the CEMP Works incident command, governance, and support structure; CEMP Works Incident Escalation and Command Procedure; and Incident Escalation Principles listed in the Scope, Governance, Command and Escalation section at the front end of this CEMP.

- 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 Whilst the CEMP Works do not directly interface with the Marston Vale Line or Midland Main Line, the Contractor acknowledges that the Order land boundary is not fully secured from the adjacent Network Rail (NR) 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 NR;
 - NR emergency contact details will be displayed within the Order land and included within the CEMP Works induction pack; and
 - Any accidental encroachment or near-miss involving the railway will be reported immediately to NR and treated as an environmental and safety incident under the CEMP incident response procedure outlined in the Scope, Governance, Command, and Incident Escalation section at the front of this CEMP.

B. CONSTRUCTION WORKING HOURS

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

07:00 – 19:00 (Monday to Friday);

07:00 – 13:00 (Saturday); and

No Sunday, Bank Holiday, or Public Holiday working unless by prior approval for specific works. Any such prior approval for Sunday, Bank Holiday or Public Holiday working will be sought from Bedford BC, with the Ministry of Housing, Communities and Local Government (MHCLG) notified in accordance with **Sections B.iii** and **B.iv**.

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 include but are not limited to the following:

- Concrete placement where the expected length of time to complete the placement cannot be accommodated within the normal daytime working hours and/or that would be unduly disruptive of other CEMP Works activities, including normal traffic operations;
- Installation of complicated structural systems or critical equipment that do not become stable until all the pieces are in place and require longer than one working day to install;
- Any oversize deliveries or other deliveries where day-time working would be excessively disruptive to normal traffic operation;
- The provision of services at compounds, including CCTV and vehicle recovery;
- CEMP Works associated with the diversion of and tie-ins to existing utilities;
- Junction tie-in works;
- CEMP Works associated with traffic management and signal changes;
- Mass grading and topsoiling where weather windows or seasonal constraints necessitate continuity of operations;
- CEMP Works where interruption would result in unsafe conditions or material quality issues (e.g. earthworks during adverse weather recovery);
- Time-critical logistics or abnormal loads requiring delivery outside standard hours; and
- Other CEMP Works agreed in advance with Bedford BC where demonstrable programme, safety, or environmental benefit can be achieved.

- B.ii.2 The 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 BC in advance. The programme for extended working hours as well as the nature of these works, once agreed with Bedford BC will be shared with MHCLG and notified to relevant stakeholders.
- B.iii.2 In the case of CEMP Works required in an emergency, or instances where CEMP Staff, public or environmental safety would be compromised if 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 No 24-hour works are anticipated. In the event that this is required, details 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 Impacts (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 Works on the Order land. The Central CLO will act as the primary point of contact for stakeholders and ensure consistency in the communication of programme information and environmental notifications through the project community interface arrangements in force at the time.
- 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. The bulletins will 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 CLP on a weekly basis, providing updates on upcoming activities, community issues raised and actions taken.
- C.i.4 **Appendix C: Properties to be Notified of CEMP Works** identifies the properties to be notified of the CEMP Works. Properties within the 100m Notification Area will be included within the CEMP Works notification distribution list (subject to address verification and data protection requirements). Notifications will be issued through the Central CLO supported by the CLP and the Contractor CLO, and will include the location, nature, timing, and expected duration of the CEMP Works together with the primary contact/complaints route.

ii Complaints Procedures for Impacts from CEMP Works (Procedure)

- C.ii.1 Signage will be displayed at prominent positions around the CEMP Land providing contact details for the receipt of incidents, emergencies, and complaints. The notices will include the 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. Escalation principles for emergencies are listed in the front section of this CEMP.

Complaint and/or Emergency Escalation Process (Procedure)

- C.ii.2 The 24-hour OSC Control Room contact number is +44 (0)20 3794 6090. This number will be used for incident reporting, emergencies and those requiring an out of hours response. A prompt response is integral to emergency management, with MHCLG to be informed within 48 hours.
- C.ii.3 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 CEMP Land access, internal escalation and liaison with the responding emergency services and relevant regulatory authorities.

D. NOISE AND VIBRATION

The detailed assessment, modelling assumptions, receptor identification, and monitoring framework for noise and vibration are set out in **Appendix F - Revised Construction Noise and Vibration Assessment**. The approach to noise and vibration management, mitigation and monitoring presented within this Section is tailored to the scale, duration, location, and risk profile of the CEMP Works and represents specific applications of the corresponding OCEMP controls.

Noise and Vibration Control

The Contractor and their Sub-contractor(s) will at all times follow best practice guidance measures to minimise noise and vibration. This will include the specific measures listed below.

i Prescribed noise and vibration limits (Standards)

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

Noise Limits

- D.i.2 A framework for assessing the potential significance of construction noise has been established in line with recognised best practice guidance. For the purposes of monitoring and control during the CEMP Works, the façade-level action limits at noise sensitive receptors are:
- 65 dB LAeq,T during the daytime (07:00–19:00);
 - 55 dB LAeq,T during the evening/weekends (19:00–23:00 on weekdays, 13:00–23:00 on Saturdays, and 07:00–23:00 on Sundays/Public Holidays); and
 - 45 dB LAeq,T during the night-time (23:00–07:00).
- D.i.3 These action limits are supported by lower trigger levels, as set out in **Table D-1**, to provide an early warning and allow mitigation to be implemented before the action limits are exceeded.
- D.i.4 These limits apply in relation to the identified noise sensitive receptors relevant to the CEMP Works, including any receptor located within the Order land but outside the CEMP Land where that receptor is relevant to the CEMP Works. The receptors used for the assessment and monitoring framework are identified in **Appendix F**.

Vibration Limit

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

ii Compliance Monitoring (Policy)

- D.ii.1 This section sets out the following:
- Compliance monitoring strategy;
 - Trigger and action levels; and

- Response procedure.

Noise Monitoring

- D.ii.2 Noise monitoring will be undertaken at locations selected to represent the identified noise sensitive receptors relevant to the CEMP Works, including receptors located within the Order land, as shown in **Appendix F, Figure 3-1 – Noise and Vibration Sensitive Receptors**.
- D.ii.3 Email/SMS text alerts will notify CEMP Works management of an exceedance of pre-set threshold levels, as set out below. A two-stage approach will be employed with 'Action levels' and 'Trigger levels' set at the values in **Table D-1**, the latter being an early warning that noise levels are approaching the Action levels, which are set at the level of the Prescribed Noise Limits.

Table D-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

Vibration Monitoring

- D.ii.4 Vibration monitoring will be undertaken at locations selected to represent the identified vibration-sensitive receptors relevant to the CEMP Works, including receptors located within Order land where applicable. The chosen monitoring locations will reflect the receptors likely to be worst affected by CEMP Works and will be used to verify compliance with the trigger and action levels in **Table D-2** below.
- D.ii.5 Trigger and Action levels are set out in below. The Action level is set at the level of the Prescribed Vibration Limit.

Table D-2 - Vibration monitoring trigger and action levels

Vibration Trigger/Action Level	Vibration Level (PPV mm/s)
Trigger Level	1
Action Level	5

Response Procedure

D.ii.6 The trigger levels provide an early warning that measure noise levels at the relevant noise sensitive receptor are approaching the action limits, enabling additional mitigation to be implemented before the action limits are exceeded. Exceedance of the trigger levels will be responded to as follows:

- If, during CEMP Works, trigger levels are exceeded, this will be reported to the designated CEMP Works Site Manager who will report to the Central Site Manager. If appropriate, the Environmental Manager will also be liaised;
- Investigate the CEMP Works being undertaken, to see if the correct plant and equipment are being used in accordance with Best Practicable Means (BPM);
- If the work, plant, and equipment are not being used correctly the CEMP Works will be stopped and corrective action taken;
- Table D-1 If the correct plant and methodology are being followed, but high levels are still being generated and are likely to exceed the prescribed noise or vibration limits (the Action levels in **Table D-1** and), further mitigation measures or alternative working practices will be adopted which generate lower noise and/or vibration levels in order to avoid the prescribed noise and vibration limits being exceeded; and
- The response procedure and outcome will be recorded by CEMP Staff.

D.ii.7 Exceedance of the Action levels will be responded to as follows:

- If, during CEMP Works, Action levels are exceeded, this will be reported to the designated CEMP Works Site Manager who will report to the Central Site Manager. If appropriate, the Environmental Manager will also be liaised; and
- The relevant CEMP Works will stop so that corrective actions can be considered and implemented. Corrective action will be taken, such as the use of further mitigation measures or alternative working practices, in order to avoid the prescribed noise and vibration limits being exceeded.

D.ii.8 Where temporary exceedances of the Action levels occur due to unforeseen circumstances and the correct methodology, plant and BPM have been observed, MHCLG (and, if appropriate, affected neighbours) will be notified and the reasons and timescales explained, with Bedford BC informed.

iii Noise and Vibration Mitigation Measures (Policy)

Noise Measures

D.iii.1 General measures:

- Noise and vibration will be reduced by careful selection of less intrusive plant and/or methods of CEMP Work, for example, breaking-out of concrete structures using, where practicable, low noise methods such as munching or similar, rather than percussion breaking;

- Advice and training on noise minimisation will be given to CEMP Staff during induction procedures;
- All plant brought onto CEMP Land will comply with the relevant EC/UK noise limits applicable to that equipment or shall be no noisier than would be expected based on the noise levels quoted in best practice guidance. Each plant item will be well maintained and operated in accordance with manufacturers' recommendations;
- Where practicable and required, static plant will be noise attenuated using methods based on advice given in best practice guidance;
- Wherever practicable, electrically powered plant will be utilised;
- Where practicable, plant generating significant levels of noise will be fitted with suitable silencers or operated within enclosures;
- Pneumatic tools will be fitted with silencers or mufflers;
- Deliveries to the CEMP Land will be programmed and routed to reduce disturbance to local residents; and
- Items of plant operating intermittently will be shut down in the periods between use.

D.iii.2 Measures specific to the CEMP Works:

- Where required to reduce impacts at nearby sensitive receptors, higher-noise activities will be scheduled to avoid the more sensitive parts of the day and will not be undertaken concurrently where this would materially increase combined noise levels.
- Temporary acoustic barriers and other noise containment measures such as screens, sheeting, and localised acoustic hoarding at the CEMP Land boundary close to existing sensitive receptors will be erected where effective and practicable, to reduce noise levels at those affected receptors. Continuous and/or periodic noise monitoring will be undertaken at agreed locations around the CEMP Land to verify compliance with agreed thresholds;
- In general, plant and material storage areas will be located away from the CEMP Land boundary, to limit impact on nearby sensitive receptors. However, where effective and practicable, temporary soil mounds shall be located as close as practicable to the redline boundary, to help screen construction noise at neighbouring residents;
- Where practicable, all stationary plant will be located so that the noise effect at receptors is reduced; and
- The details and location of these measures are included in **Appendix F**.

Vibration Measures

- Where reasonably practicable, plant and/or methods of CEMP Work causing significant levels of vibration at sensitive premises will be replaced by other less intrusive plant and/or methods of working;
- To reduce any potential adverse impacts as a result of vibration from stationary plant, equipment will not be located immediately adjacent to sensitive receptors and will be isolated using resilient mountings; and

- The characteristics of vibration emissions from each item of plant, and their collective effect, will be assessed during the selection process for the acquisition of plant. Where practicable, plant will be selected which will have the least impact in terms of vibration.

E. CONTROL OF DUST AND OTHER EMISSIONS TO AIR

The approach to air quality management, mitigation and monitoring presented within this Section is tailored to the scale, duration, location, and risk profile of the CEMP Works and represents specific applications of the corresponding OCEMP controls.

i Prescribed Limits (Standards)

- E.i.1 The Contractor will establish and implement dust monitoring across the CEMP Works, adopting a risk-based approach to ensure that monitoring is focused on locations with medium to high dust risk, including areas close to sensitive receptors. The Central Site Manager will receive escalations where trigger/action thresholds are exceeded or repeated complaints arise.
- E.i.2 Daily visual checks will be undertaken during activities with the potential to generate dust. Additional checks will be undertaken during prolonged dry weather, high winds, intensive earthworks or where activities are taking place close to sensitive receptors.
- E.i.3 Monitoring will comprise a combination of visual inspections (as defined in **Appendix G: Dust Management Plan**) and, where appropriate, instrumented monitoring to verify compliance with agreed limits.
- E.i.4 The IAQM directed action level is $190\mu\text{g}/\text{m}^3$ over a 1-hour averaging period, and sets out the associated monitoring, mitigation, and exceedance response arrangements for dust. For the purposes of this CEMP, this is the prescribed dust emissions action benchmark applicable to the CEMP Works. Exceedance limits are not included for other emissions to air, as these are not considered proportionate for the CEMP Works. The generation of other emissions would be limited plant used for CEMP Works.
- E.i.5 All plant used for CEMP Works will, as a general standard, comply with Euro Stage V emissions requirements for Non-Road Mobile Machinery (NRMM) and Euro Stage VI for on-road delivery vehicles attending CEMP Works. Where this is not reasonably practicable due to supply constraints or disproportionate cost, equipment of an appropriate alternative standard may be used in exceptional circumstances.
- E.i.6 Activities with a high potential to generate dust shall not be undertaken continuously without appropriate control. Where such activities are prolonged, the Contractor shall implement appropriate mitigation measures (refer to **Section Eiii**) to prevent excessive dust generation and allow dust to settle.
- E.i.7 A continuous operating period of more than 4 hours without such measures should be avoided unless monitoring and inspections confirm that dust emissions remain effectively controlled as determined by the Environmental Clerk of Works (EnvCoW).
- E.i.8 The IAQM guidance includes alternative dust deposition monitoring methods, such as frisbee-type and glass slide gauges. However, these require laboratory analysis and therefore do not provide the real-time data offered by the proposed live monitoring under the CEMP Works. Other methods, such as sticky pads, are not considered proportionate due to their unreliability, sensitivity to placement, and the mobile nature of the works. These are also more suited to dense residential or commercial environments than open-field conditions.

- E.i.9 Where dust is observed leaving the CEMP Land, or where a complaint or monitoring trigger occurs, the Contractor will investigate the cause and implement corrective action.
- E.i.10 Records of inspections, monitoring, complaints, and corrective actions will be retained by the Contractor.

ii Compliance Monitoring with Prescribed Emission Limits (Policy)

- E.ii.1 Monitoring compliance with prescribed emission limits will be undertaken in accordance with **Appendix G - Dust Management Plan**, using a risk-based combination of daily visual inspections and, where appropriate, instrumented monitoring at agreed locations close to the CEMP Land boundary.

Exceedance Protocol (Dust and other emissions to air)

- E.ii.2 Where monitoring, daily inspections, weather conditions or site observations indicate that dust or other emissions to air have exceeded, or are likely to exceed, the prescribed limit(s) or action level(s), the following protocol will be implemented:
- Identify and contain (immediate): The CEMP Works Site Manager will review the activity generating emissions, implement immediate containment/mitigation measures and, where necessary, pause the specific activity to prevent further emissions;
 - Apply additional mitigation (same shift): Additional controls will be applied as appropriate to the source and conditions, which may include: increased damping down; covering or stabilising stockpiles and exposed surfaces; reducing vehicle speeds; increasing road/haul route cleaning; stopping dry sweeping; reducing drop heights; and/or erecting screening/windbreaks where practicable;
 - Adopt alternative working practices (if risk remains): Where additional mitigation is insufficient (or exceedance risk remains), the activity will be modified, resequenced or temporarily stopped until conditions allow compliant working. Alternative practices may include rescheduling high-dust operations away from high-risk weather conditions, reducing concurrent dust-generating activities, changing loading/unloading methods, or altering haul route arrangements to reduce dust generation;
 - Escalate and record: The exceedance (or near-miss), likely cause, weather conditions, actions taken and outcome will be recorded in the CEMP log. Repeat occurrences will trigger a review of controls and relevant method statements, with briefing of the workforce on revised measures before works continue;
 - Restart criteria: The affected activity will only recommence once controls are confirmed as effective (through inspection and/or monitoring trend) and the risk of further exceedance is reduced to an acceptable level.
- E.ii.3 Daily inspections within and outside the CEMP Land will be undertaken by the EnvCoW or a delegate, where receptors (including roads) are nearby, to monitor dust and ensure compliance with **Appendix G**. The inspection results will be recorded, and the CEMP Land logbook will be made available to the Environmental Manager when asked. This will include regular dust soiling checks of surfaces such as street furniture, cars, and windowsills within 100m of the CEMP Land boundary, with cleaning to be provided if necessary.

iii Mitigation Measures for Emissions Impact (Policy)

E.iii.1 Detailed mitigation measures to control dust and other air quality emissions are included in **Appendix G**. General CEMP Period mitigation measures include:

- The use of BPM during the CEMP Works to mitigate emissions from the CEMP Land and activities to avoid causing a statutory nuisance.

CEMP Land Management

- All dust and air quality complaints will be recorded, cause(s) will be identified, appropriate actions will be undertaken to reduce emissions in a timely manner, and the measures taken will be recorded. The complaints will be reported to the OSC by the Contractor CLO in line with the process described in **Section C.ii**;
- The complaints log will be made available to MHCLG and Bedford BC upon request; and
- Any exceptional incidents that cause air emissions, either within CEMP Land or outside the CEMP Land, and the action taken to resolve the situation will be recorded.

Preparing and Maintaining the CEMP Land

- Materials that have a potential to produce dust from the CEMP Land will be removed as soon as possible, unless being re-used. If they are being re-used, wherever reasonably practicable:
 - Existing areas of hard standing to be removed will be damped down prior to breaking out; and
 - Wherever reasonably practicable the stockpiles will be covered, seeded, or fenced/screened to prevent wind whipping.

General Operations

- Enclosed chutes and conveyors and covered skips will be used.

Measures Specific to Earthworks

- Where practicable, windbreak netting/screening will be positioned around material stockpiles and vehicle loading/unloading areas, as well as exposed excavation and material handling operations, to provide a physical barrier between the CEMP Land and the surroundings;
- Where practicable, stockpiles of soils and materials will be located as far as possible from sensitive properties, taking account of the prevailing wind direction;
- During dry or windy weather, material stockpiles and exposed surfaces will be dampened down using a water spray to minimise the potential for wind pick-up; and
- All construction vehicles and plant will comply with the speed limit within the CEMP Land. The applicable speed limits and associated traffic management arrangements will be established through the Transport Coordinator's logistics arrangements, and compliance within the CEMP Works area will be implemented and managed by the Contractor, with CLP support for communal logistics controls where relevant.

F. MATERIAL STORAGE MANAGEMENT (METHOD STATEMENT)

- F.i.1 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 (crushed) construction aggregates and contaminated soils awaiting disposal outside the Order land and/or within Order land treatment to minimise the potential for generation of contaminated run-off and dust; and
 - Use of dust and odour suppression techniques during development to minimise impacts outside the Order land.
- F.i.2 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.3 In addition to the controls set out in this CEMP, storage and handling of fuels, oils, chemicals, and other potentially polluting materials will comply with all relevant legislation and recognised good practice, including the applicable oil storage, pollution prevention, and environmental permitting requirements in force at the time of the CEMP Works.
- F.i.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.
- F.i.6 The secondary containment system will provide storage of at least 110% of the tank’s maximum capacity and ensure that any valves, filters, sight gauges, vent pipes, or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges are contained.

G. SOILS MANAGEMENT

The management of soils during CEMP Works is critical to preserving soil structure, preventing contamination, and ensuring successful reinstatement. All soil handling activities will follow a defined sequence of stripping, stockpiling, protection, and reinstatement. Detailed methodologies are provided in **Appendix I: Soil Management Plan**.

Section G and **Appendix I** deal with soil-management matters only. Controls relating to retained vegetation, habitat protection and tree/hedgerow management are addressed separately through **Section O** and the relevant ecological/vegetation appendices.

i Stripping Methods (Procedure)

- G.i.1 Topsoil and subsoil stripping will be undertaken in a controlled sequence to support the mass grading works and to minimise damage to soils. Soil stripping will be carried out using suitable plant and methods appropriate to the soil conditions at the time of CEMP Works, with unsuitable weather or ground conditions reviewed before stripping continues. Stripped soils will be managed to prevent unnecessary mixing, compaction, erosion, sediment-laden runoff, and contamination.
- G.i.2 Further details of Stripping Methods are detailed in **Appendix I**.

ii Stockpiling Arrangements (Procedure)

- G.ii.1 Stripped soils will be stored in designated stockpile areas within the CEMP Land, with topsoil and subsoil stored separately where required. Stockpiles will be managed to maintain soil quality, reduce erosion, prevent sediment-laden runoff, and avoid cross-contamination with unsuitable or contaminated materials. Stockpile locations, heights, drainage controls, and inspection requirements will be managed in accordance with the project soil management arrangements.
- G.ii.2 Stockpiling Arrangements, including the location of topsoil stockpiles, are detailed in **Appendix I**.
- G.ii.3 All CEMP Works to be carried out in accordance with best practice guidance.

iii Reinstatement Procedures (Procedure)

- G.iii.1 Where soils are required for reuse or reinstatement, they will be handled, placed, and managed to maintain soil function and suitability for the intended end use. Reinstatement will be undertaken using suitable materials and methods to avoid compaction, poor drainage, contamination or mixing of soil horizons. Any surplus or unsuitable material will be managed in accordance with the relevant waste, materials management, and contamination controls.
- G.iii.2 Further details are provided in **Appendix I**, **Section I**, **Section M** and **Section N**.

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(1): Stage 1 Compound and Appendix B(2): Stage 2 Compound** have been designed to provide greater provision than the baseline requirements for CEMP Staff that are anticipated to utilise these compounds to carry out CEMP Works. 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; and
- Support good welfare standards and ensure sufficient capacity during periods of intensified activity.

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 the relevant **Appendix B** layout plans, including **Appendix B(1)** and **Appendix B(2)** where applicable.

iii Construction Equipment and Plant (Plan and Procedure)

H.iii.1 The following measures related to arrangement of construction equipment and plant will be implemented.

H.iii.2 Appropriate stockpile segregation, locations, and containment measures will be implemented to minimise the exposure of surface water and groundwater from contaminated run-off and CEMP Staff and local neighbours from any windblown dusts, and vapours. These measures will include:

- The use of impermeable sheeting or geotextile membranes beneath contaminated stockpiles to prevent leachate entering the ground;
- Maintaining a distance of 10m from watercourses, drainage channels, and discharge points;
- 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 Measures to limit landscape and visual impacts from site welfare facilities, fencing and storage include:

- Plant and material storage areas will be located away from the CEMP Land boundary. However, based on construction logistics, temporary soil mounds or hoarding will be located close to the

CEMP Land boundary in areas where no existing vegetation is being retained and where it does not impede construction access to the CEMP Land, to help screen views for neighbouring residents at Stewartby, Wootton and Kempston Hardwick;

- At locations where it is known that there will be no future works that would require their removal, soils may be placed in stable final earthwork profiles where this forms part of the efficient balancing and placement of mass grading materials and does not conflict with later CEMP Works. For clarity, this does not include permanent landscaping, permanent topsoil reinstatement, or permanent planting under this CEMP;
- Appropriate location, organisation, and phasing of CEMP Works shall be applied so that temporary visual screening and orderly site management are achieved during the CEMP Period. Any permanent landscaping, final topsoil reinstatement or permanent planting package will be addressed separately where applicable;
- Where hoardings are used, these will be sensitively coloured and positioned to minimise the visual impact to nearby sensitive receptors; and
- Visual clutter associated with CEMP Works will be further limited through appropriate storage of materials/plant/equipment, and management of materials within CEMP Land.

H.iii.4 Compounds and CEMP Land working areas will be sited away from sensitive features such as known bat roosts, watercourses, and running water habitats.

H.iii.5 The maximum operating height of construction equipment is anticipated to be 20m.

I. CONSTRUCTION WASTE MANAGEMENT

i Storage and Segregation of Waste (Procedure)

I.i.1 Storage and segregation of waste, and the areas where they are to be carried out, are described and shown in **Appendix J: Construction Waste Management Plan**, and shown on the relevant **Appendix B** layout plans, including **Appendix B(1) – Stage 1 Broadmead Road Compound** and **Appendix B(2) – Stage 2 Broadmead Road Compound** where applicable. These areas may include:

- Local waste storage/segregation areas within the compounds; and
- Wider waste sorting/handling areas outside the compounds, where materials such as hardstanding debris or similar arisings are sorted, segregated, or prepared for reuse or removal, subject to the applicable pollution prevention, drainage, and access controls in this CEMP.

For the purposes of this CEMP, no waste sorting or handling area shall be located within 10m of a watercourse, drainage channel, or discharge point.

I.i.2 Any waste sorting/handling area outside the compounds will be located and operated so as to avoid adverse effects on nearby receptors and will not be located within the relevant stand-off distances to watercourses or drainage features. Such areas will operate in accordance with the waste management, runoff control, dust control, and traffic management arrangements set out in this CEMP.

I.i.3 CEMP Staff in the 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.4 Dedicated, clearly marked waste storage areas will be established within the CEMP Land, positioned away from watercourses and sensitive receptors, and maintained securely. The plan requires 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 are mandated to prevent nuisance, cross-contamination, and environmental harm.

I.i.5 Waste segregation follows the waste hierarchy by maximising opportunities for reuse and recycling. Materials will be stored cleanly and correctly labelled to reduce contamination and improve acceptance at recycling facilities. Hazardous and non-hazardous wastes will be properly characterised under the Waste Classification: Guidance on the classification and assessment of waste (WM3), with hazardous materials stored with secondary containment where required. CEMP Staff, including the Waste Manager, 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 The procedure for removing waste from the CEMP Land is described in **Appendix J**.

I.ii.2 All waste leaving the CEMP Land must be transported by a registered waste carrier, accompanied by a Waste Transfer Note (WTN) or Hazardous Waste Consignment Note, which must be retained for the required statutory period.

- I.ii.3 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 project's waste hierarchy objectives, including maximising reuse and recycling and minimising disposal to landfill.
- I.ii.4 Any soils and stones to be retained within the CEMP Land shall be managed in accordance with **Section G** of this CEMP and **Appendix I - Soil Management Plan**.

J. CONSTRUCTION LIGHTING MANAGEMENT

- 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. 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 Broadmead Road and Elstow Brook;
 - Lighting levels around site compounds will be kept to the minimum necessary for security and safety, which has been set as a lux level of 1;
 - 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;
 - Lighting around CEMP Works and compounds will utilise directional cowl 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; and
 - Temporary lighting used for CEMP Works will be switched off when not in use.

Temporary Lighting mitigation measures

- J.i.2 In addition to the measures above, where use of artificial lighting cannot be avoided in areas of sensitive habitats, any temporary lighting during CEMP Works 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 paths;
 - A dark corridor should always be maintained overnight within watercourses allowing fish passage;
 - 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.3 Night works is defined as works undertaken between dusk and dawn. No night works is anticipated be undertaken adjacent to the dark corridor, if 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).

J.i.4 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.5 The following mitigation measures will be implemented in line with best practice should night works be required:

- Minimise the use and duration of lighting;
- Directional lighting used only where absolutely necessary to safely complete the CEMP Works;
- Light shields installed to avoid light spill;
- Low lux levels and warm lighting where possible (2700 Kelvin or lower); and
- Lighting to be turned off when not in use as part of the CEMP Works.

K. STRATEGY FOR PILING OPERATIONS AND ASSOCIATED RISK ASSESSMENT

- K.i.1 The CEMP Works include ground improvement measures comprising the installation of Controlled Modulus Columns (CMC)/rigid inclusions within the areas identified in **Appendix B(5) – Ground Improvement/CMC Extent Plan**. The CMC/rigid inclusion installation method does not include percussive piling, driven piling, or similar high-vibration piling techniques. However, because the method is ground-intrusive, this Section addresses the relevant matters under Condition 12(3)(k) on a proportionate basis.
- K.i.2 CMC/rigid inclusion works are limited to the geographical extent shown on **Appendix B(5)**. **Appendix B(5)** defines the maximum endorsed extent of CMC/rigid inclusion works for this CEMP.
- K.i.3 The CMC/rigid inclusion installation method comprises specialist ground improvement plant forming columns/inclusions from prepared working platforms within the ground improvement areas shown on **Appendix B(5)**. The column/inclusion depth, diameter, spacing, installation sequence, and working platform requirements will be controlled through the detailed engineering design and task-specific RAMS, within the geographical extent and environmental control framework set out in this CEMP.
- K.i.4 CMC/rigid inclusion works present a low vibration risk when compared with driven or percussive piling methods. Noise and vibration from the CMC/rigid inclusion works will be managed in accordance with **Appendix F - Revised Construction Noise and Vibration Assessment** and **Section D** of this CEMP. Where monitoring identifies trigger or action level exceedances, the response procedure in **Section D.ii** will be implemented.
- K.i.5 Groundwater protection controls associated with the CMC/rigid inclusion works are addressed through the CEMP controls for surface water management, contamination prevention, and pollution control. The works will be undertaken using controlled installation methods and task-specific RAMS to prevent the creation of uncontrolled preferential pathways, mobilisation of contamination, release of grout/concrete residues to groundwater or surface water, and uncontrolled arisings. Groundwater, runoff, grout / concrete management, arisings, refuelling, and pollution prevention risks associated with the CMC/rigid inclusion works will be managed in accordance with **Sections L, M and N** of this CEMP.
- K.i.6 Where unexpected ground conditions, groundwater ingress, contamination, artesian conditions, loss of grout/concrete, or another condition with implications for groundwater or controlled waters is encountered, works will stop locally and the matter will be escalated to the Contractor Environmental Manager and the suitably qualified geoenvironmental advisor. Works will recommence only once the condition has been assessed, and the required controls have been implemented.
- K.i.7 On the basis that CMC/rigid inclusion works do not involve driven or percussive piling, a separate piling risk assessment for high-vibration piling is not required. The ground-intrusive and environmental risks associated with CMC/rigid inclusions are addressed through this **Section K**, **Sections L, M and N**, **Appendix F**, and the Ground Improvement/CMC Extent Plan in **Appendix B(5)**.

L. MANAGEMENT OF SURFACE WATER

This section sets out how surface water will be managed for the CEMP Works to (i) maintain safe access/egress and protect people and property during rainfall events; (ii) prevent silt-laden or contaminated runoff entering watercourses and drainage systems; and (iii) ensure temporary drainage, attenuation and exceedance routing are implemented, inspected, and maintained in a controlled and auditable manner.

Appendix N - Preliminary Earthworks Specification sets formation-level mass grading parameters only; the temporary surface water management measures, flood emergency arrangements and drainage pathway controls for the CEMP Works are set out in this **Section L** and **Appendix M - Flood Emergency Plan**.

Appendix B(4) - Water Management Plan illustrates the strategy for managing surface water and controlling sediment within CEMP Land.

The CEMP Land interface between Phase 1 and Phase 2 of the Mass Grading CEMP Works is shown in **Appendix B(6) - Overlapping CEMP Land Plan**. Surface Water Management within the Core Zone is to be managed in line with the endorsed Phase 1 Mass Grading CEMP, whilst the surface water management of CEMP Works within the West Gateway Zone will be in accordance with this section and **Appendix B(4) - Water Management Plan** of this Phase 2 Mass Grading CEMP.

i Temporary Structures (Procedure)

- L.i.1 The Contractor will manage surface water during the CEMP Works to prevent pollution, uncontrolled runoff, sediment mobilisation, flooding, erosion and adverse effects on existing drainage assets, watercourses, and downstream receptors.
- L.i.2 The CEMP Works include the construction of surface water management infrastructure within the West Gateway Zone, including attenuation ponds, swales, carrier drains, outfall ditches, culverts, chambers, headwalls, and other buried drainage elements. These are identified in **Appendix B(4) Water Management Plan**. Permanent surface water management features will be constructed in phases alongside the mass grading works and, where appropriate, may be used to assist with the management of surface water during the CEMP Period.
- L.i.3 Where permanent drainage features are used for temporary construction water management, the Contractor will inspect and maintain those features during use and will rehabilitate them where required before they are brought into permanent operational use.
- L.i.4 The following will be implemented during the CEMP Period:
 - Temporary sacrificial SuDS features, such as ditches, grips, basins, berms, and settlement ponds will be implemented during the CEMP Period. These features will be used to intercept and treat sediment loaded runoff from the CEMP Land before entering the receiving network. The SuDS features will be regularly inspected to ensure that they are working effectively;
 - Surface water runoff rates will be controlled and restricted to existing greenfield Qbar/Qmed values, being 156.46 for the West Gateway Zone. Controlling runoff to greenfield rates will prevent overloading of the temporary SuDS features and support their effective operation in managing runoff volumes and sediment mobilisation;

- Surface water runoff will be attenuated for up to and including the critical 1 in 10-year rainfall return period, including 40% climate change, summer and winter, durations ranging between 15 and 10,080 minutes (7 days);
- Drainage interceptors will be used for high-risk areas, such as areas used for refuelling, large car parking, and hazardous material storage;
- Bunded areas, concrete aprons, and contained drainage areas will be implemented where the risk of pollutants entering and contaminating a watercourse is high;
- Dewatering of excavations into temporary SuDS and ponds will allow for interception, settlement, and mitigation of pollutants before entering the receiving watercourse; and
- Elstow Brook monitoring relevant to the CEMP Works will be undertaken within 2 months of commencement of the CEMP Works and every 3 months thereafter during the CEMP Period, to confirm that no excess sedimentation or pollution has resulted from the CEMP Works. Monitoring locations, parameters, inspection records, and any corrective actions will be managed through the Contractor's environmental monitoring regime and reported to the Central Site Manager.

- L.i.5 Surface water controls will be inspected regularly and following heavy rainfall events. Any accumulated silt, debris or obstruction will be removed and managed appropriately. Damaged or ineffective controls will be repaired, replaced, or supplemented as soon as practicable.
- L.i.6 No uncontrolled discharge of silty water, contaminated water, concrete wash water, grout, fuel, oils, chemicals, or other polluting material will be permitted to enter existing drains, ditches, watercourses, attenuation features, or unprotected ground.
- L.i.7 CEMP Works associated with existing Internal Drainage Board (IDB) drainage assets will be planned and undertaken in communication with the relevant Internal Drainage Board. Anticipated works include ditch widening and culvert installation along IDB watercourses. The IDB has confirmed that the relevant drainage feature is an IDB asset and that, provided regular communication is maintained with the IDB regarding the works, no separate IDB consent is required for the activities covered by this CEMP. The Contractor will maintain communication with the IDB before and during relevant works and will retain records of communications, agreements, and any agreed working requirements.
- L.i.8 Prior to works affecting existing IDB drainage assets, the Contractor will confirm that the IDB has been notified of the proposed activity, programme, and working methodology. Records of correspondence with the IDB will be retained by the Contractor.

ii Flood Emergency Measures (Procedure)

- L.ii.1 The Contractor will manage flood risk during the CEMP Works in accordance with the **Appendix M - Flood Emergency Plan**, once prepared or confirmed for the West Gateway Zone.
- L.ii.2 The Contractor will review weather forecasts and flood alerts during the CEMP Period and will plan activities to reduce the risk of flood-related harm, pollution or damage to temporary works, plant, materials, and drainage infrastructure.
- L.ii.3 Flood emergency measures include the following:

- Contractor will sign up for flood warnings and check online warnings regularly when appropriate i.e. following periods of heavy rainfall to receive accurate warning before a flood event with adequate time to evacuate, undertake pre-emptive flood protection tasks and/or take safe refuge depending on the scale of the warning/alert. The Central Site Manager will endeavour to ensure that everyone on the CEMP Land is aware of the situation during a flooding event and whether evacuation may be necessary;
- Depending on the scale of the warning/alert, the Central Site Manager will monitor the local news and forecasts to decide whether it is prudent to close and evacuate the premises or seek refuge within Core Zone and East Gateway Zone where flood risk is lowest. In the event of CEMP Land closure, the Central Site Manager will secure utilities and equipment, deploy flood defences where required, ensure safe evacuation or refuge as appropriate, and make all CEMP Staff aware of the situation, with on ground Emergency Services instructions taking precedence;
- In case of an evacuation, the 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, CEMP Land-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 CEMP Works induction. Existing flood zones and flood risk sources will be used to inform and support CEMP Works where appropriate e.g. phasing, stockpiling, machinery storage, and method statements.

L.ii.4 Where severe rainfall or flood conditions are forecast, the Contractor will review planned works and will modify, postpone, or stop activities where required to prevent environmental harm or unsafe working conditions.

L.ii.5 Following heavy rainfall or flood events, the Contractor will inspect working areas, haul roads, stockpiles, surface water controls, drainage features, and watercourse interfaces. Any damage, erosion, silt accumulation, pollution risk, or blockage will be recorded and corrected.

iii Potable and Foul Water (Procedure)

L.iii.1 Potable water for welfare facilities within the CEMP Land will be supplied via a tankered supply to the CEMP Land welfare unit. The Contractor will source water from an area that:

- Is not considered as seriously water stressed by the Environment Agency;
- Does not negatively impact Groundwater Dependent Terrestrial Ecosystems (GDTE); and

- Does not negatively impact the supply of fresh water to statutory designations.
- L.iii.2 Conservation measures will be implemented in relation to CEMP Works water supplies that are required for CEMP Staff, sanitary facilities, wheel washing and concrete mixing. Measures to reduce the potable and non-potable water use on 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 Disposal of foul water arising out of the CEMP Works during the CEMP Period will be through:
 - A self-contained welfare unit with a holding tank will be used, with regular pump-out and removal outside of the CEMP Land to be disposed by a licensed waste carrier;
 - Disposal will be to a suitably permitted local wastewater treatment works in the Anglian Water region, undertaken by a licensed waste carrier. Where practicable, disposal to a treatment facility within the Bedford area will be specified; however, final discharge locations may vary depending on the operational arrangements of the appointed waste contractor;
 - 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.

iv Works Near Water Bodies or Watercourses (Method Statement)

- L.iv.1 The following measures are to be implemented near water bodies or watercourses:
 - High risk activities associated with the CEMP Works (e.g. mixing of materials, hazardous materials storage, fuel storage tanks, locating toilet blocks within the welfare facilities) are not to be undertaken within 10m of the Riparian Buffer 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 Sediment and runoff controls (during CEMP Works)

- Temporary runoff interception and treatment measures will be implemented and maintained so that untreated, silt-laden runoff does not enter water receptors. Controls may include (as appropriate to risk and location) grips/swales to settlement features, silt fencing at sheet-flow edges, stabilisation/covering of exposed soils, and protection of drainage inlets/outfalls where present.

L.iv.4 Working practices and weather triggers:

- During periods of heavy rainfall, high flows or where erosion risk is elevated, high-risk activities will be modified, re-sequenced or temporarily paused and protective measures maintained (e.g. stabilisation/covering of exposed soils) until conditions improve.

L.iv.5 Inspection and maintenance:

- The Contractor will inspect runoff/sediment controls at an appropriate frequency during works and following rainfall events, maintain/repair controls as required, and record inspections and corrective actions in the CEMP log.

L.iv.6 Incident response (sediment release/pollution event):

- If a sediment release, spill, or control failure occurs, CEMP Works will stop locally, the release will be contained and cleaned up, and the incident will be recorded and escalated in accordance with the CEMP incident management arrangements outlined in the Scope, Governance, Command and Escalation Section at the front end of this CEMP. CEMP Works will recommence only once controls are reinstated and confirmed effective.

L.iv.7 Aquatic ecology considerations:

- Other appropriate measures to protect the water environment to eliminate or minimise risk to aquatic habitats, flora, and fauna will be implemented in accordance with **Section Oii**. Should any part of a watercourse need to be impounded during the works, then a fish translocation exercise may need to be carried out.

L.iv.8 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 site condition reporting and investigation information; and
 - Risks arising from permitted CEMP Works - including topsoil stripping, mass grading, excavation, drainage construction, culvert installation, haul road construction, material handling, ground improvement and associated temporary works. These activities have the potential to encounter, disturb, or mobilise existing contamination, or to create new contamination risks if materials, fuels, oils, concrete, grout, silt-laden water, or wastes are not properly controlled.
- M.i.4 The Contractor will assess and manage potential contamination risks associated with the CEMP Works to prevent harm to human health, controlled waters, surface water features, groundwater, soils, ecology, and other environmental receptors.
- M.i.5 The key relevant contamination risks anticipated to arise from the CEMP Works are set out below:

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
- The vicinity of the existing level crossing, former utility corridors, and historic road margins can have elevated risk due to legacy railway operations, buried services, or informal tipping.

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.

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.

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.

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.

- M.i.6 Where suspected contamination is encountered, best practice as identified in **Section N** will be followed, CEMP Works in the affected area will stop, the area will be made safe, and the Environmental Manager will be notified. The material will not be disturbed, reused, removed, or disposed of until it has been assessed, and an appropriate management route has been confirmed.
- M.i.7 Records of contamination observations, inspections, testing, waste classification, disposal records, permits, transfer notes and corrective actions will be retained by the Contractor.

Cross-Contamination from interfacing landfill drainage pipe

- M.i.8 A disposal pipe from a local landfill site runs directly beneath the CEMP Land. The precise location of this pipe is currently unknown; however, trial trenches and ground investigations are currently underway to determine its exact location. If the pipe remains in-situ and is undisturbed during CEMP Works it is unlikely the contaminants within the pipe will leech out into the surrounding soils. However, because the location and trace of this pipe is not yet fully understood, there is a potential

risk of the pipe being struck or damaged during the CEMP Works which in turn could lead to cross-contamination. Once the full extent / location of the pipe is identified, the CEMP Works Site manager will ensure that a suitable stand-off for CEMP Works is enforced, reducing risk of cross-contamination.

- M.i.9 In the event that cross-contamination from the pipe is identified, best practice provided in **Section N** will be followed, CEMP Works in the affected area will stop, the area will be made safe, and the Environmental Manager will be notified. The material will not be disturbed, reused, removed, or disposed of until it has been assessed, and an appropriate management route has been confirmed.
- M.i.10 The procedure to be followed for assessing and managing unexpected contamination will be in accordance with the Detailed Remediation Strategy. Where remediation is required, the relevant requirements of Condition 14 of the SDO will be complied with, including submission under Condition 14(7), where applicable, following completion of the remediation works. The process is as follows:
- Identify potential pollutant linkage;
 - Assess contamination risk;
 - Determine whether remediation or mitigation measures are required;
 - Develop and implement an appropriate remediation or mitigation approach where required;
 - Undertake verification of completed works; and
 - Comply with the relevant requirements of Condition 14 of the SDO.
- M.i.11 In the event that the pipe's location restricts or interferes with the CEMP Works, the implications will be assessed and appropriate control measures developed in accordance with the Detailed Remediation Strategy and the requirements of Condition 14 of the SDO. Any additional submissions, approvals, remediation measures or verification requirements arising from the discovery of the pipe will be undertaken in accordance with the SDO and any relevant regulatory requirements in force at the time.

N. CONTAMINATION PREVENTION AND CONTROL

Introduction

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

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

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

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

The controls in this **Section N** 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: Land Contamination Status within the CEMP Land** below, represent a low risk to future site users, adjacent properties, and controlled waters.

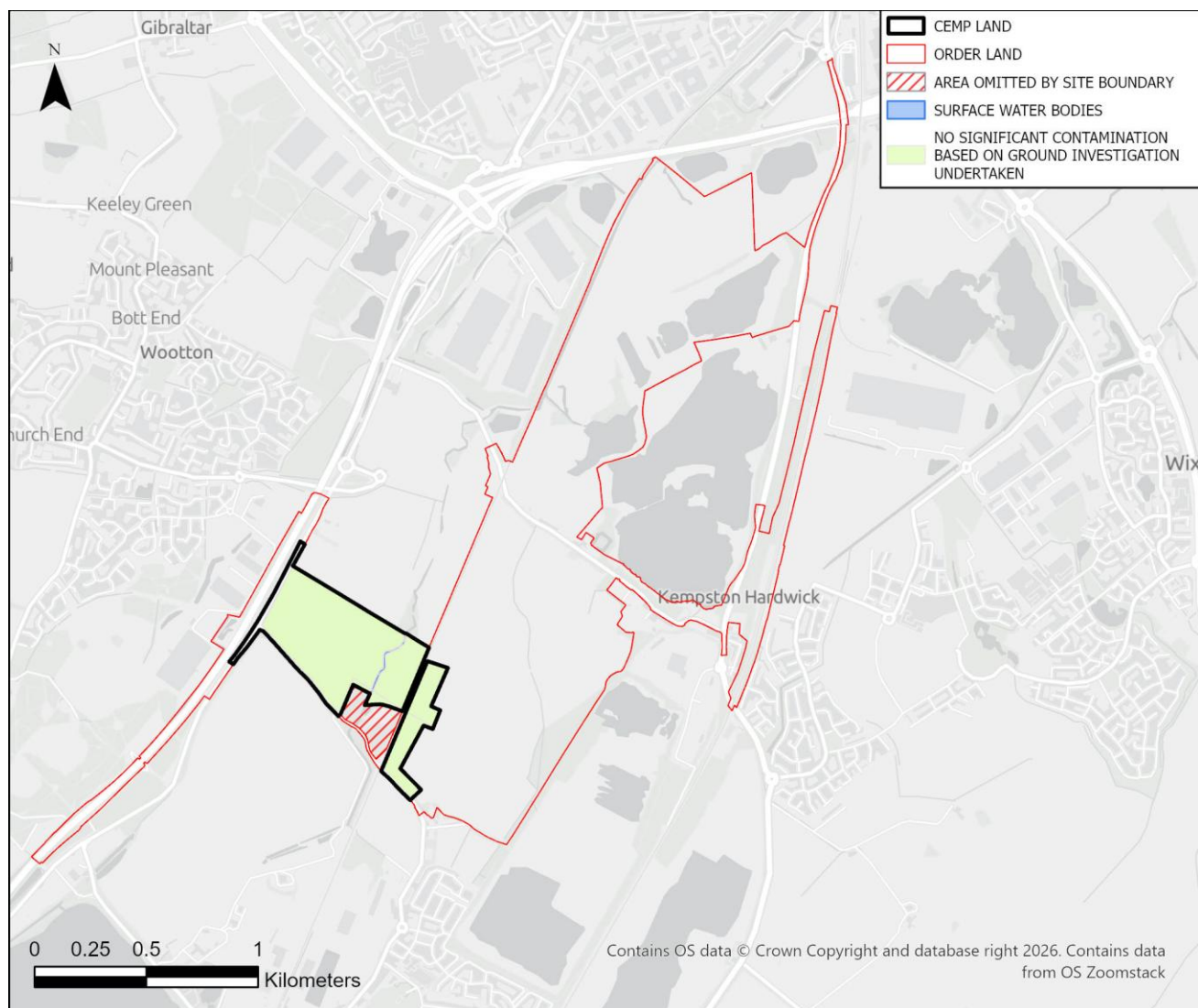


Figure N- 1: Land Contamination Status within the CEMP Land

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

For clarity, the land contamination assessment uses colour-coded categories to identify the level of contamination risk and the corresponding control pathway. **Figure N-1** shows the CEMP Land covered by this CEMP as Green, meaning that no significant contamination risks requiring remediation have been identified within the CEMP Land, subject to the implementation of standard controls and the unexpected contamination procedures set out in this **Section N**.

The current assessment does not identify any Pink Areas within the CEMP Land. In the wider Detailed Remediation Strategy terminology, Pink Areas are areas that would require further investigation or targeted controls before construction activities proceed. References to Pink Areas in this section are therefore retained only to explain the precautionary pathway that would apply if localised or previously unidentified contamination is encountered during the CEMP Works, or if any area is subsequently assessed as requiring further investigation or targeted controls.

Detailed Remediation Scheme (availability and application)

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

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

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

The CEMP Land is categorised into:

- Green Areas – no significant contamination risks requiring remediation, subject to standard controls and unexpected contamination procedures;

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 the zone.

- Green Areas Control Approach – Standard good practice + unexpected contamination procedure.

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

- N.i.1 All waste leaving the Order land must be transported by a registered waste carrier, accompanied by a Waste Transfer Note (WTN) or Hazardous Waste Consignment Note, which must be retained for the required statutory period.
- N.i.2 **Preliminary Earthworks Specification** defines the formation level earthworks/mass grading parameters for the CEMP Works. Material suitability will be managed through the CEMP controls and, where applicable, the detailed remediation scheme (available on request) prior to the relevant grading works commencing.
- N.i.3 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**;
 - Acute exposure to potential contamination for CEMP Staff will be mitigated through normal working practice using appropriate RAMS and use of standard PPE and hygiene best practice guidance at all times during the CEMP Works. Where contamination is suspected, CEMP Staff

will be provided with appropriate PPE or respiratory protective equipment (over and above the standard PPE) where specified by the RAMS to prevent direct contact, ingestion or inhalation of potential soil or groundwater contamination;

- Appropriate 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 available within CEMP Land;
- Hazardous materials already present on 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 J**. 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; and
- It is anticipated that some of the excavations will encounter groundwater (perched or otherwise). Water ingress has the potential to be contaminated and will require management through either dewatering and/or disposal under Duty of Care to dispose appropriately of excavated water or discharge to a surface water lake within the CEMP Land under an appropriate surface water discharge consent. Measures should 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 **Section Niii** for measures to protect waterbodies from contamination).

N.i.4 There are contamination risks that are expected to arise from the CEMP Works in the CEMP Land due to undetermined areas, as shown in **Figure N-1**, the following precautionary measures must be employed:

- Excavations works in pink 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 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 Measures to protect watercourses will follow the guidelines set out in the EA PPG documents described in the Introduction to **Section L** and **Appendix M - Flood Emergency Plan**, and any contamination-risk-related additional controls will be implemented in accordance with the detailed remediation scheme (available on request) and relevant method statements.

Watercourse protection – enhanced controls

- N.ii.2 Measures in this section are focused on preventing silt-laden or contaminated runoff, fuel/chemical pollution impacts to watercourses, surface water features, and drainage networks during the CEMP Works.
- N.ii.3 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).
- N.ii.4 Concrete, grout and related washout/washdown activities may form part of the CEMP Works, including where required for culverts, buried drainage elements, temporary bridge works, and ground improvement. These activities will be undertaken only in designated controlled areas and will be managed so that no concrete washout water, grout water, alkaline runoff, slurry, or residue is discharged to ground, drainage systems or watercourses.
- N.ii.5 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 for spills, leaks, containment failure, and other pollution incidents are set out in the Scope, Governance, Command, and Incident Escalation section near the front of this CEMP;
 - 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 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 on the relevant **Appendix B** compound/layout plans, including **Appendix B(1)** and **Appendix B(2)** where applicable;
- Wash out of any cement or concrete lorries will not be discharged to receiving water environment or foul water sewer and will not be carried out within 10m of any existing watercourses, overland flow paths, and drainage network; 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 will be undertaken on all vehicles leaving the CEMP Land in designated areas shown on the relevant **Appendix B** compound/layout plans, including **Appendix B(1)** and **Appendix B(2)** where applicable;
- Wheel cleaning will be provided through a combined rumble strip and wheel dip arrangement at the transition between stone haul routes and hardstanding/asphalt surfacing. The rumble strip will assist in loosening and removing mud and debris from vehicle tyres, while the wheel dip will provide additional tyre cleaning where required.
- The wheel dip will be managed to prevent uncontrolled discharge of dirty water, sediment-laden water, or other potentially polluting material. Water and sediment from the wheel dip will be contained, inspected, and managed appropriately. Accumulated mud, silt, and debris will be removed as required and disposed of or managed in accordance with the relevant waste and pollution prevention controls.
- The rumble strip, wheel dip and surrounding hardstanding will be inspected regularly and maintained to ensure they remain effective. Where heavy rainfall, high traffic movements, or visible track-out increase the risk of sediment mobilisation, inspection and maintenance frequency will be increased.
- Where additional cleaning is required, supplementary measures such as road sweeping, scraping, manual cleaning, damping down or other appropriate controls will be implemented.
- The location and arrangement of wheel cleaning facilities are shown in **Appendix B - Description of the CEMP Works and Arrangements for Site Welfare, Fencing and Construction Equipment**. Surface water controls associated with wheel cleaning areas will be managed in accordance with **Section L: Management of Surface Water**, **Appendix M - Flood Emergency Plan** and **Section N.ii**.
- 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.iii.2**. Temporary 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.

- The Contractor will confirm the specific 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)

- Refuelling of construction plant will be undertaken only in designated refuelling areas or controlled refuelling locations appropriate to the plant being refuelled and the location of the CEMP Works;
- Where refuelling is undertaken within compounds or other fixed refuelling areas, it will be carried out with suitable containment and drainage controls, which may include oil interceptors, sealed containment sumps or holding tanks where provided;
- Where refuelling is required at specific plant locations within the CEMP Works, temporary controlled refuelling arrangements will be used. These may include drip trays, plant nappies, spill mats, portable bunding, double-skinned bowsers, shut-off valves, spill kits, and supervised refuelling procedures. Refuelling will be undertaken a minimum of 10m from watercourses and, so far as reasonably practicable, away from drainage channels, overland flow paths, unprotected drains, protected species mitigation areas, ecological exclusion zones, and other environmentally sensitive receptors;
- Where used oil interceptor and sealed sump/holding tank (including accumulated water, separated oils, and any captured debris/silt) will be managed as waste and removed by an appropriately authorised contractor to a suitably permitted facility; no discharge from refuelling areas will be made to ground, surface water drains or watercourses;
- Fuel will be stored in secondary containment and located a minimum of 10m from any watercourse. The secondary containment system will provide storage of at least 110% of the tank's maximum capacity and ensure that any valves, filters, sight gauges, vent pipes, or other ancillary equipment are also situated within the secondary containment system and arranged so that any discharges are contained;
- Drip trays will be installed to collect leaks from diesel pumps;
- Refuelling equipment will be regularly inspected, and any maintenance or repairs will be carried out immediately;
- All refuelling will be supervised by a suitably qualified operative and supplied with appropriate spill kits;
- Refuelling and fuel deliveries/unloading will be supervised by a competent person in accordance with task-specific RAMS, with pre-use checks of hoses/couplings/valves and use of drip trays/absorbents where appropriate to manage minor leaks;
- Where leaks are identified (e.g. staining, drips, damaged hoses, or fittings), refuelling/delivery will stop, the leak will be contained and cleaned up using spill response equipment, and defective equipment will be isolated and repaired/replaced before refuelling resumes; and

- Any refuelling-related spill or pollution incident will be managed under the CEMP incident response arrangements (set out in the Scope, Governance, Command, and Incident Escalation section near the front of this CEMP), and refuelling area liquids/oils will not be discharged to foul sewer or drainage connections outside CEMP Land.

O. NATURAL ENVIRONMENT

General Site Management

The approach to ecological management, mitigation and monitoring presented within this Section is tailored to the scale, duration, location, and risk profile of the CEMP Works and represents specific applications of the corresponding OCEMP controls.

General environmental protection measures will be implemented during the CEMP Period. Such measures include best 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:

- A suitably qualified Ecological Clerk of Works (ECoW) will be 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.
- This CEMP (including **Section O**) has been prepared to be in substantial accordance with Reference Document 9 (the OCEMP), implementing its approach to ECoW competence, ecological mitigation, monitoring, and reporting. Where any measure is not applicable to the specific CEMP Works, this is identified and the rationale is stated;
- Measures will be taken to protect the Specified Habitats during the CEMP Works, through physical protection, access controls and activity-specific controls for dust, surface water, and pollution prevention, as stated in **Section E**, **Section L** and **Section N**, and implemented under ECoW oversight;
- For the purposes of this CEMP, retained Habitats are those applicable to the CEMP Works as identified through the endorsed ecological control documents in force at the time.
- Protection measures 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 in accordance with **Section E** and **Appendix G** (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.
- Where a Specified Habitat is to be created as part of the wider Authorised Development but is not yet substantially established at the time of the CEMP Works, the ECoW will advise any modified or interim protection measures that are appropriate to that habitat's stage of establishment, while maintaining the objective of avoiding harm to protected species and ecological receptors;
 - **Appendix B(3) – Vegetation Removal and Retention Plan** identifies vegetation to be retained within the CEMP Land, vegetation already removed as part of enabling works, and vegetation to be removed as part of enabling works.
 - No vegetation removal is proposed as part of the CEMP Works. Vegetation/hedgerow removal already undertaken, or to be undertaken, as part of enabling works is identified on **Appendix B(3)** for transparency and to distinguish the enabling works baseline from the CEMP Works.
 - Retained trees, hedgerows, vegetation, retained habitats, ecological exclusion zones and dark corridor areas shown on **Appendix B(3)** will be protected during the CEMP Period through the measures set out in this **Section O**, including demarcation, access control, exclusion zones, pre-commencement ecological checks and ECoW oversight where required.
 - 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 the 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 CEMP Works.
 - 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; and
 - The ECoW will advise any additional habitat-specific measures required for particular Specified Habitat areas (e.g. additional buffers, timing restrictions, or method adjustments) based on their sensitivities and the specific CEMP Works proposed nearby.

i Management of Invasive Non-native Species (Procedure)

- O.i.1 The detailed invasive non-native species controls for the CEMP Works, including pre-works checks, exclusion zones, biosecurity controls, species-specific measures (where relevant) and waste/disposal controls, are set out in **Appendix R – Invasive Non-Native Species Plan**. **Section O.i** sets out the controlling requirement to implement those measures where relevant to the CEMP Works.

- O.i.2 The following measures will be carried out to manage the risk of spreading invasive non-native plant and animal species:
- An ECoW will be appointed to oversee the invasive non-native species management;
 - Prior to the commencement of any vegetation and clearance within the CEMP Land, a pre-construction invasive non-native species (INNS) check will be undertaken by an ECoW. 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 any identified areas of invasive species; and
 - Defra's "Check, Clean, Dry" principles will be followed such that all PPE and survey equipment is clean and dry (and if necessary, disinfected) if required prior to going to and from a site with known invasive species.
- O.i.3 Any removal of invasive species will adhere to good practice measures and a 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 ECoW 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 as close to their original location as practicable prior to removal to licensed facilities; and
 - Surveys have indicated the presence of Japanese Knotweed adjacent to Manor Road, which requires these mitigation measures to be adhered to:
 - Establishment of a 7m 'no tracking/excavation' fenced buffer around the Japanese knotweed stand;
 - Soil or plant material shall not be moved from the agreed buffer zone area to other parts of the Order land without review by the ECoW;
 - Dedicated boots and tools in an invasive non-native species zone;
 - A 10m stand off to watercourses will be maintained for storage of any invasive non-native plant species to prevent wash water discharge;
 - Avoid any ground disturbance where knotweed is present, unless for removal of the Japanese knotweed by a specialist contractor;
 - Ensure any disposal of knotweed (if identified within the CEMP Land) 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 of by a specialist at a licensed facility.

- Any removal of invasive species will adhere to the measures outlined in **Appendix R - Invasive Non-Native Species Plan**.

ii Management Measures for Protected Species and Habitats (Procedure)

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

Pre-Commencement Surveys

- O.ii.2 Pre-commencement surveys/checks relevant to the CEMP Works will be undertaken by the ECoW or an appropriately qualified and experienced delegate appointed by the ECoW. Before any CEMP Works (including vegetation removal) commence in the relevant area, the ECoW or delegate will complete a written check-off confirming either:
- That no protected species/active nests/relevant habitats are present that would prevent the works proceeding; or
 - That the necessary exclusions, controls, supervision, and/or licences are in place.
- O.ii.3 The written check-off record will be retained on the CEMP Land for audit/compliance purposes.
- O.ii.4 Where pre-commencement surveys identify protected species or habitats such that CEMP Works cannot proceed under the existing endorsed controls, or where additional licensing, exclusion measures or a material change to the CEMP measures is required, the Site Controller will notify MHCLG before CEMP Works commence in the affected area; such notification will include the location/extent relevant to the CEMP Works area and the specific protection/mitigation measures to be implemented.

Bats

- O.ii.5 A European Protected Species Mitigation License (EPSML) has been granted by Natural England which stipulates management and monitoring measures for licensed activities for the Authorised Development. The CEMP Works will be undertaken in accordance with the EPSML management and monitoring procedures.
- O.ii.6 A dark corridor has been identified along the Elstow Brook, with lighting plans to be in place throughout the completion of CEMP Works as per **Section J**.

Badgers

- O.ii.7 A badger mitigation licence (hereafter, the 'Badger Licence') has been obtained from Natural England for the CEMP Works. CEMP Works and associated mitigation measures will be undertaken in accordance with the measures outlined in the Badger Licence method statement to minimise the risk of damage or disturbance and follow and best practice guidance protocols.
- O.ii.8 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. This will be carried out a maximum of three months in advance of initial commencement of CEMP Works in areas of potential badger habitat. Relevant notifications, approvals, and reporting will be undertaken with Natural England in accordance with the applicable licence requirements.
- O.ii.9 Badgers use the wider area for foraging and commuting purposes and therefore measures will be put in place during the CEMP Period to minimise effects upon badger movement and foraging activity. These will comprise:

- Fencing off or covering dangerous areas of the CEMP Land (e.g., deep excavations) with badger proof fencing; or providing a means of egress from shallow excavations, such as animal ladders; and
- Avoidance of storage of plant and materials on areas of potential foraging habitat (e.g., retained grassland).

O.ii.10 If any potential or confirmed additional badger setts are identified during CEMP Works, these will be checked by the Named Ecologist or their accredited agents associated with the Badger Licence prior to any clearance works to confirm their status. The Named Ecologist or accredited agent will be contacted immediately should an active sett be identified to determine whether an amendment to the licence is required.

Otters

O.ii.11 In addition to the 'General Site Management' measures above the following measures will be completed specifically in relation to otter:

- Pre-construction surveys will be carried out to re-assess and determine status of otter on watercourses and water bodies within the vicinity from CEMP Land. Survey will be completed prior to CEMP Works commencing;
- Obstructions to established otter paths and access to open water will be avoided;
- 30m exclusion zones around any holts and shelters identified will be fenced prior to CEMP Works commencing. If otters are known or suspected to be breeding, the exclusion zone may be extended according to the judgment of the ECoW or SQE; and
- Where CEMP Works are within the vicinity of a watercourse or water body known or assumed to support otter but will not be directly impacted by the CEMP Works a 10m Riparian Zone will be maintained along the watercourse/to the edge of the water body and the CEMP Land. The area will be demarcated to prevent encroachment onto potential otter habitat.

O.ii.12 If breeding is confirmed and exclusion zones as described above are not possible, the Contractor will liaise with the Promoter and the ECoW to determine if an EPSML is required before proceeding with any CEMP Works within the exclusion zone. If it is deemed that a License is required, this will be obtained from Natural England, and all mitigation measure specified in that License will be complied with.

Wintering Birds

- O.ii.13 General construction measures will be employed to minimise the effects of noise pollution (**Section D**), dust and air pollution (**Section E**) and visual intrusion during the CEMP Period.
- O.ii.14 Strict adherence to construction working zones and fencing around zones will restrict access into areas of Specified Habitats and will reduce potential effects during the CEMP Period.

Breeding Birds

- O.ii.15 No vegetation clearance of suitable habitat for breeding birds is anticipated under the CEMP Works.
- O.ii.16 If it is necessary to carry out the clearance of suitable habitat during the breeding season, the following measures will be implemented:

- Habitats will be subject to a pre-clearance watching brief by an ECoW or SQE. The watching brief will be undertaken a maximum of 48 hours prior to the vegetation removal taking place (unless otherwise stated by the ECoW);
- In the event any active nests are found or suspected, clearance works will be halted within a minimum distance of 5m from the nest. This buffer distance will be varied on the advice of an ECoW with relevant ornithology experience, dependent on the nature of affected habitats and the species of bird involved. Clearance works will not recommence until any young have fledged and left the nest, with a re-inspection by the ECoW to confirm the absence of active nests; and
- Maintaining bare ground will be used to dissuade ground nesting species. Where this is not possible, appropriate deterrent measures will be deployed (such as potential use of noise devices) to deter birds from nesting, followed by the completion of a pre works survey to check for presence of nests.

Schedule 1 Birds

- O.ii.17 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.18 If a Schedule 1 bird species is identified during the pre-works checks, the ECoW will determine an appropriate course of action. Where an active nest is confirmed or suspected, CEMP Works will cease in the affected area, and an exclusion zone will be implemented to avoid the risk of intentional or reckless disturbance. The extent of the exclusion zone will be set by the ECoW (taking account of species sensitivity, habitat, and the nature of CEMP Works) to avoid intentional or reckless disturbance. CEMP Works will not recommence within the exclusion zone until the ECoW has confirmed that the nest is no longer active.
- O.ii.19 Where practicable, measures to reduce nesting suitability at PNS (e.g. removal of redundant PNS features, or temporary exclusion/capping) will be implemented outside the breeding season and in advance of CEMP Works, under the direction of an ECoW/suitably experienced ornithologist. Where practicable, measures to reduce nesting suitability at PNS (e.g. removal of redundant PNS features, or temporary exclusion/capping) will be implemented outside the breeding season and in advance of CEMP Works, under the direction of an ECoW/suitably experienced ornithologist. Where this is not practicable due to programme constraints, CEMP Works will proceed only following the pre-commencement checks and implementation of any ECoW-specified exclusion zones and controls. If the ECoW advises that any activity proposed as part of the CEMP Works could risk disturbance of a Schedule 1 bird (or otherwise requires licensing), the Contractor will liaise with the ECoW to secure the appropriate licence/consents before proceeding, and will comply with all licence requirements.

Barn Owls

- O.ii.20 Should evidence of a PNS for barn owl be identified within 150m of the CEMP Works during the pre-commencement surveys, 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.
- O.ii.21 If a PNS is identified during CEMP Works within the bird breeding season, or if any identified PNS are unable to be removed or excluded prior to the commencement of CEMP Works, then the following guidelines will be followed:

- An ECoW will be engaged prior to the commencement of CEMP Works to survey the PNS for evidence of Schedule 1 breeding activity;
- Should the PNS be identified as an occupied breeding site then a protection zone will be defined based on the potential for disturbance, to be determined by the ECoW; and
- Should it not be possible to implement the required protection zone distance, monitoring of the status of the nest site will be made.

Reptiles

- O.ii.22 Reptile mitigation and, where required, translocation, destructive search and receptor-area measures for the CEMP Works will be undertaken in accordance with **Appendix P – Reptile Method Statement**, under the direction of the ECoW. **Section O** sets out the controlling requirement to implement those measures where relevant to the CEMP Works.
- O.ii.23 Where required, a destructive search will be completed as part of the removal of any refugia within the CEMP Land. If any reptiles are found within the CEMP Land following the trap and translocation effort, they will be relocated to a predetermined translocation site. Where translocation is required, the reptile receptor area(s) will be established within the CEMP Land (excluded from the working area) in a location agreed by the 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.24 CEMP Works will proceed in adherence to the requirements in the District Licensing Scheme (DL) for Bedfordshire.

Aquatic Ecology

- O.ii.25 All CEMP Staff should be made aware of the need to protect watercourses from any potential contamination from CEMP Works (including measures as set out in **Sections M** and **N**). This will be communicated via toolbox talks presented by a SQE.
- O.ii.26 The following would be implemented during the CEMP Period:
- Sediment management and water quality monitoring would be implemented during any CEMP Works with the potential to affect watercourses;
 - Measures to manage unintended sediment releases and chemical/fuel spills are detailed in **Section N**;
 - When CEMP Works, including stockpiling, plant, and vehicle washing, occur near a watercourse, they will be separated from the watercourse with barriers (e.g. sediment fences) to prevent surface runoff from these entering the watercourse. CEMP Works will be as far from the bank top of a watercourse and/or connected hydrological pathways as practicable, but in no case less than 10m;
 - Impacts to vegetation within the riparian zone during the CEMP Period will be monitored for recovery and suitably reinstated;
 - CEMP Works will avoid being carried out on soft riverbanks wherever practicable to avoid compaction, erosion, and sediment release. Where temporary crossings or permanent structures

are being constructed on watercourses, these CEMP Works will remain localised within proximity to the structure;

- Impacts to vegetation within the riparian zone during the CEMP Period will be monitored for recovery and suitably reinstated;
- Where CEMP Works could transmit noise or vibration to a waterbody, the ECoW will review fish sensitivity and advise proportionate controls (e.g. timing, plant selection, stand-off distances) to minimise disturbance. Timing of CEMP Works near watercourses will be organised to allow for fish dispersion;
- An exclusion zone from the water's edge of at least 10m on Elstow Brook will be enforced throughout the CEMP Period, to avoid impacts to watercourses/water bodies; and
- Should any part of a watercourse need to be impounded during the CEMP Works, then a fish translocation exercise may need to be carried out. Any such operation will need careful co-ordination to set-up and drain any coffer dam or impounded areas.

Terrestrial Invertebrates

- O.ii.27 If removal of any rubble, brash or log piles is required as part of the CEMP Works, then a PWMS will be employed, including pre-works checks and, where appropriate, destructive searches. Prior to removal, a toolbox talk will be presented by the ECoW.

Additional Species of Principal Importance and Animal Welfare Considerations

- O.ii.28 The CEMP Land is anticipated to support Species of Principal Importance (SPI) including brown hare), hedgehog and common toad.
- O.ii.29 In addition to the 'General Site Management' measures above, mitigation for SPI will comprise of the following measures which would be outlined in a method statement prepared by the Contractor and overseen by the ECoW:
- An ECoW will undertake a pre-works check and advise appropriate controls (including exclusion zones and/or method adjustments) before CEMP Works proceed;
 - Ecological support from the ECoW will be required during animal burrow excavations and vegetation/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.30 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 the ECoW or SQE, taking care to avoid any injury, and relocated to a suitable habitat outside the working area and beyond the influence of CEMP Works, in a location agreed by the ECoW.
- O.ii.31 Any activity related to SPI will be supervised by the ECoW or SQE to minimise the risk of harm to SPI, who will hand search vegetation for these species prior to clearance each day.

Monitoring

- O.ii.32 **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 works proximity/sensitivity or inspection findings indicate this is necessary. For aquatic habitats, water quality monitoring will be undertaken quarterly as indicated in **Table O-1**.
- O.ii.33 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.
- O.ii.34 **Table O-1 – Monitoring of Ecological Mitigation Measures during the CEMP Period**

Feature	Construction Monitoring
Aquatic Habitats	Impacts to vegetation within the riparian zone will be monitored for recovery and suitably reinstated. Sediment management and monthly water quality monitoring.
Bats	Measures to align with the monitoring strategy as part of any EPSML. Monthly checks of tree protection fences by the Named Ecologist, accredited agent, or an appropriate person, appointed by the Named Ecologist.
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 the ECoW or a SQE.
Breeding birds	Monthly checks for breeding birds and of tree and habitat protection measures during the breeding season by the ECoW or a SQE.
Reptiles	Monthly checks for reptiles and of implemented mitigation measures by the ECoW or a SQE.
Amphibians	Monthly checks of implemented mitigation measures by the ECoW or a SQE.
Terrestrial Invertebrates	Monthly checks of implemented mitigation measures by the ECoW or a 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 the ECoW or a SQE. Monthly checks of implemented mitigation measures by the ECoW or a SQE.

iii Vegetation Retention and Removal Plan (Plan)

- O.iii.1 Vegetation to be retained as part of the CEMP Works is shown in **Appendix B(3)**.

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

- O.iv.1 No vegetation removal is proposed as part of the CEMP Works, and retained vegetation will be protected by measures including incorporation of an appropriate buffer (as determined by an Arboricultural Clerk of Works (ArbCoW)), demarcated with appropriate protection (refer to **Paragraph O.iv.4** below). Protective measures are in substantial accordance with reference Document 21 (Arboricultural Impact Assessment Report).
- O.iv.2 Notwithstanding, prior to the commencement of CEMP Works, a survey will be undertaken of arboricultural features on the CEMP Land. If vegetation impacts/removal are determined by the survey, it will be ensured that this is reduced as far as practicable and that tree protection is reflective of tree size. This survey will be carried out as a separate package of works.
- O.iv.3 Relevant protective principles set out best practice guidance in relation to design, demolition and construction will be applied.
- O.iv.4 Bespoke mitigation measures for retained vegetation include:
- Construction Exclusion Zones (CEZs) around the Root Protection Areas (RPAs) demarcated by tree protection fencing or similar; and
 - Temporary ground protection measures.
- O.iv.5 Stockpiles, material storage, compounds, vehicle tracking, and soil bunds will be located away from trees and hedgerows, where practical, to ensure no damage occurs to these features and CEMP Works remain outside of the CEZ of the features.
- O.iv.6 To ensure compliance with best standard practice (as stated in Document 21 (Arboricultural Impact Assessment Report)), a 15m buffer has been put in place around assessed trees, also known as an RPA. Veteran Tree T80, on the western bank of a Great River Ouse tributary within the CEMP Works Boundary, will be retained along with its Root Protection Area (RPA), extending 15 times the trunk diameter.
- O.iv.7 No CEMP works within RPAs are anticipated. Should CEMP Works be required within an RPA, supervision by an ArbCoW will be take place with any additional recommendations followed.
- O.iv.8 Measures will be taken to protect retained habitats within Specified Habitats through usage of appropriate protective fencing and signage installations during CEMP Works. This may include the use of solid hoardings, to reduce visual and noise effects from CEMP Works.
- O.iv.9 The location of compounds, access/haul routes, storage areas are shown on the relevant plans in **Appendix B(1)** and **Appendix B(2)**. Retained vegetation is shown on **Appendix B(3) Vegetation Removal and Retention Plan**.

P. ROLES AND RESPONSIBILITIES (POLICY)

- P.i.1 Personnel with defined environmental responsibilities during the CEMP Period are identified in **Table P-1** All defined appointments are in place.
- P.i.2 **Section P** and **Table P-1** define the specialist environmental roles and competence requirements supporting delivery of the CEMP Works. The incident command and site governance hierarchy for incidents and emergencies is set out in the Scope, Governance, Command, and Incident Escalation section near the front of this CEMP. **Section C** contains the resident engagement, complaints, and contact arrangements only.
- P.i.3 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.4 All appointed specialists have been inducted on the CEMP Scope, site constraints, key control plans, and escalation procedures, and deputy arrangements have been established.
- P.i.5 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.6 The Site Controller and Contractor will appoint and retain persons with suitable qualifications and experience to carry out, or advise on, specialist matters through a proportionate procedure that includes:
- Defining role-specific competence requirements (qualifications, professional memberships, and relevant experience);
 - Credential and competency verification prior to appointment;
 - Induction on CEMP scope, CEMP Land constraints, control plans, and escalation arrangements;
 - Maintaining deputy/cover arrangements to ensure continuity; and
 - Managing personnel changes under document control with competence re-checks and a structured handover. Records of appointments, competence evidence and briefings will be retained and made available for audit/compliance checks.
- P.i.7 These arrangements are supported by access to organisations and specialist supply chains with sufficient depth and breadth to provide, retain and, where necessary, replace appropriately qualified personnel without loss of competence or continuity.

Table P-1 - Personnel with Defined Environmental Responsibilities

Role	Role Description Relevant to this CEMP
Assessment and prevention of relevant contamination risks and other risks of environmental pollution	<ul style="list-style-type: none">■ 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;

Role	Role Description Relevant to this CEMP
	<ul style="list-style-type: none"> ▪ Extensive experience in monitoring, reporting, and raising incidents; and ▪ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Monitoring noise and vibration	<ul style="list-style-type: none"> ▪ Member of Institute of Acoustics with sufficient technical experience across projects of a similar scale and complexity; ▪ Deep understanding of the CEMP Land as well as Authorised Development background and history; ▪ Experience managing people in this technical discipline; ▪ Extensive experience in monitoring, reporting, and raising incidents; and ▪ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Monitoring dust and other emissions to air	<ul style="list-style-type: none"> ▪ Member of Institute of Air Quality Management with sufficient technical experience across projects of a similar scale and complexity; ▪ Deep understanding of the CEMP Land as well as Authorised Development background and history; ▪ Experience managing people in this technical discipline; ▪ Extensive experience in monitoring, reporting, and raising incidents; and ▪ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Contractor	<ul style="list-style-type: none"> ▪ Ensuring that the CEMP Works proceeds in accordance with all relevant environmental construction mitigation measures; including water quality, sediment monitoring, and geo-environmental engineering aspects; and ▪ Reviewing and inputting into risk assessments, including contamination risks and environmental processes and management systems.
Environmental Clerk of Works (EnvCoW)	<ul style="list-style-type: none"> ▪ 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
Ecological Clerk of Works (ECoW)	<ul style="list-style-type: none"> ■ Technical experience across projects of a similar scale and complexity; ■ Deep understanding of the CEMP Land as well as Authorised Development background and history; ■ Experience managing people in this technical discipline; ■ Extensive experience in monitoring, reporting, and raising incidents; and ■ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Arboriculture Clerk of Works (ArbCoW)	<ul style="list-style-type: none"> ■ Member of Arboricultural Association accredited body with sufficient technical experience across projects of a similar scale and complexity; ■ Deep understanding of the CEMP Land as well as Authorised Development background and history; ■ Experience managing people in this technical discipline; ■ Extensive experience in monitoring, reporting, and raising incidents; and ■ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Health and safety	<ul style="list-style-type: none"> ■ Member of Institution of Occupational Safety and Health with sufficient technical experience across projects of a similar scale and complexity; ■ Deep understanding of the CEMP Land as well as Authorised Development background and history; ■ Experience managing people in this technical discipline; ■ Extensive experience in monitoring, reporting, and raising incidents; and ■ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Named Ecologist	<ul style="list-style-type: none"> ■ 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 guidance, including appropriate stakeholder engagement;

Role	Role Description Relevant to this CEMP
	<ul style="list-style-type: none"> ■ Holds any relevant protected species licence(s) and is the named licence ecologist or accredited agent where applicable.
Geoenvironmental Engineering Advisor	<ul style="list-style-type: none"> ■ Member of Institution of Civil Engineers with sufficient technical experience across projects of a similar scale and complexity; ■ Deep understanding of the CEMP Land as well as Authorised Development background and history; ■ Experience managing people in this technical discipline; ■ Extensive experience in monitoring, reporting, and raising incidents; and ■ Has a thorough understanding of incident escalation processes in accordance with best practice guidance, including appropriate stakeholder engagement.
Archaeological Clerk of Works	<ul style="list-style-type: none"> ■ Associate of Chartered Institute for Archaeologists accredited body with sufficient experience (including fieldwork) 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 construction traffic management arrangements for the CEMP Works, including 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 CEMP Land access arrangements, including primary, secondary, temporary, and alternative access points, are set out in the **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 Delivery Management System (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 CLP/Transport Coordinator in advance of CEMP Works commencing, and will be confirmed at a CTMP kick off meeting.
- Q.ii.2 The CLP/Transport Coordinator is responsible for the allocation, operation, and administration of the DMS across the Order land, including allocation of booking capacity and access windows between the different CEMP Works packages and contractors. For the CEMP Works, the Contractor and Transport Coordinator will operate within that Order land-wide DMS allocation and governance framework.
- Q.ii.3 All deliveries intended for the CEMP Land will be required to be booked in through an online DMS at least 48 hours in advance and traffic management will be supervised by the CLP/Transport Coordinator. Abnormal loads will require a minimum of seven days' notice.

SUPERVISED (SITE CONTROL AND GATEKEEPING)

- Q.ii.4 All deliveries will be required to visit the Logistics Hub (CA2) where their arrival will be checked against the daily delivery schedule. Drivers will be held here within a Lorry Holding Area (LHA)/queuing/turnaround areas located at CA2 until they are authorised to proceed to their delivery

destination. Construction Logistics and Community Safety (CLOCS) checks will also be carried out at this location.

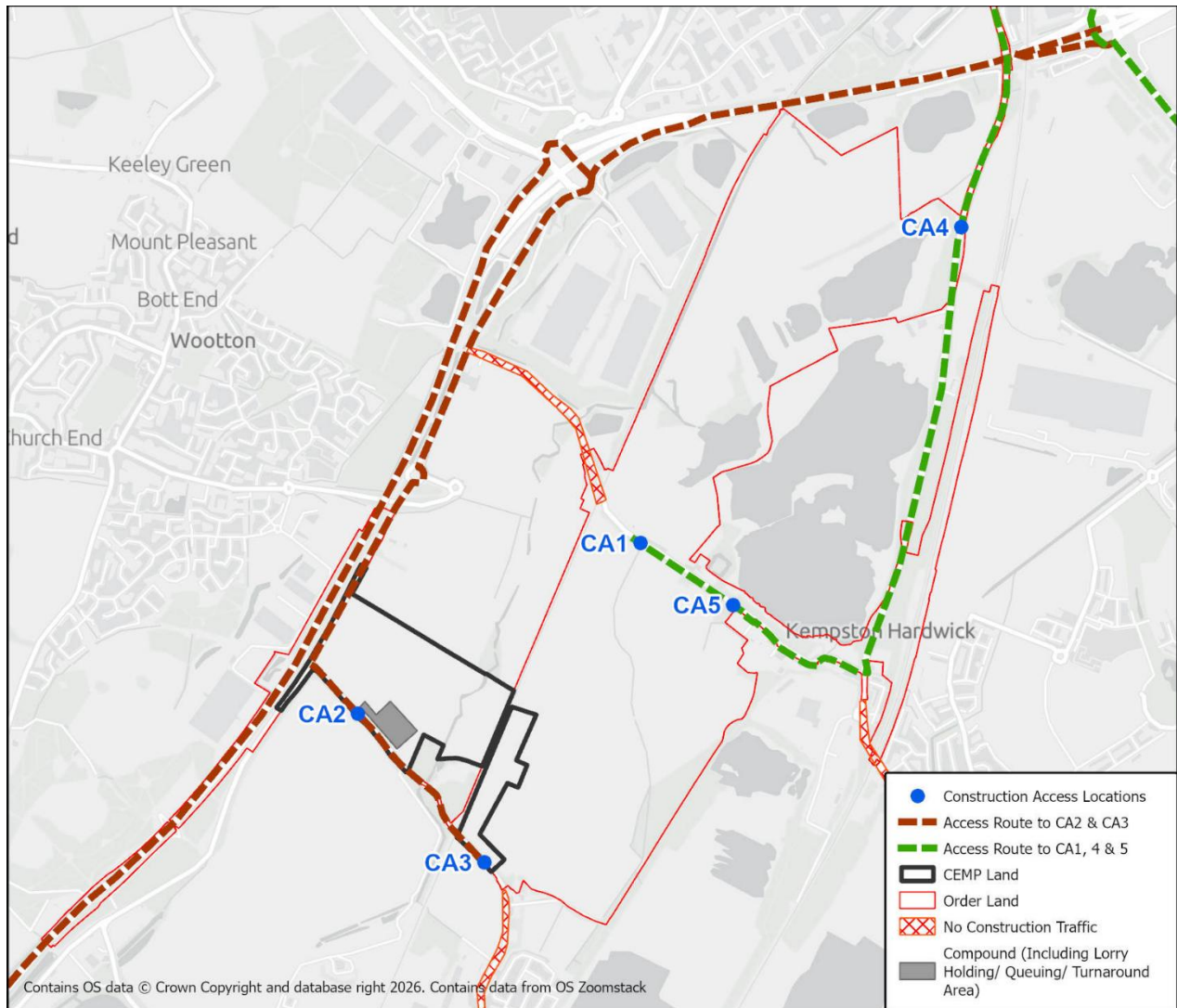
CONTROLLED (ROUTING, CAPS AND COMPLIANCE CONTROLS)

- Q.ii.5 All deliveries will be required to follow predetermined routes to the CEMP Land avoiding restricted areas, routes and, where possible, local roads as shown in **Figure Q-1: Access Arrangements for the CEMP Works**.
- Q.ii.6 Delivery data will be collected for the purpose of SDO reporting.
- Q.ii.7 Prior to CEMP Works commencing, 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). Wherever possible, HDVs and suppliers should use the strategic road network avoiding local roads.
- Q.ii.9 The routing phasing is as follows:
- 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);
 - The route for construction traffic via Broadmead Road to the West Gateway Zone and 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;
 - 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.
- Q.ii.10 Delivery routing will be controlled through the CLP/Transport Coordinator 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 CLP/Transport Coordinator DMS.

MONITORED (RECORDING, REPORTING AND REVIEW)

Monitoring Report

- Q.ii.13 The DMS will be monitored on a daily basis against the actual HDV deliveries and if there is a breach of the HDV upper limits, the Contractor via their Transport Coordinators will notify the CTMG as part of the reporting procedure. Daily monitoring will help to ensure that any issues are identified at an early stage and dealt with promptly.

- Q.ii.14 In addition to notifying the CTMG of any breaches, every three months the Contractor via their Transport Coordinators will prepare a monitoring report and submit it to the CTMG for review. The quarterly reports will include the following for the previous quarter:
- Record of DMS bookings;
 - Comparison of DMS bookings against HDV deliveries;
 - Comparison of HDV deliveries against HDV limits;
 - Monitoring data;
 - 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); and
 - 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, so that advanced mitigation measures can be identified and implemented in good time.

Review

- Q.ii.15 The review process for the measures and commitments detailed within this section will be through the CTMG. Reviewing the results of the monitoring process is therefore essential to ensure that the CTMG delivers the required outcomes.
- Q.ii.16 Effective review mechanisms can avoid the need for invoking any default mechanisms or resorting to enforcement action, through the CTMG considering remedial actions at an early stage to avoid repeated non-compliance.
- Q.ii.17 As stated above, the CTMG will be notified of any breaches of the HDV restrictions through the DMS system.
- Q.ii.18 The CTMG will also be provided with a quarterly monitoring report summarising the monitoring results for the previous quarterly period. The monitoring report will be provided at least three working days before the CTMG meeting.
- Q.ii.19 The CTMG will meet every three months and will discuss the monitoring report and agree any refinements to the CTMG 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 (As defined in **Paragraph Q.ii.21**).
- Q.ii.20 The Contractor monitoring report will be provided at least three working days before the CTMG meeting.
- Q.ii.21 For the purposes of this CTMG, '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.22 The Contractor will use internal management procedures, together with the CLP/Transport Coordinator governance arrangements, to ensure compliance with the SDO limits and CTMP measures. This will include:
- Kick Off Meetings;
 - Site Induction;
 - Driver's User Group;
 - CTMG Learning Reports;
 - CTMG Feedback Reports; and
 - Order land-wide logistics 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.23 Should the monitoring of the 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 warning letter to relevant sub-contractors will be undertaken.
- Q.ii.24 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.25 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. The corrective action would need to be 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.26 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.27 The CTMP will also form part of the induction for all CEMP Staff.

- Q.ii.28 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).
- Q.ii.29 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).
- Q.ii.30 Approved delivery routes, prohibited areas, local restrictions and any route-specific instructions will be communicated through Transport Coordinator/CLP inductions, driver briefings, Contractor CPP arrangements, and the DMS booking system.

HOLDING ARRANGEMENTS (VEHICLES PRIOR TO ARRIVAL)

Lorry Holding Area

- Q.ii.31 The relevant LHA, marshalling area, queuing or turnaround area associated with the applicable construction access will be used to temporarily hold deliveries until they are called forward to the relevant delivery zone. Whilst within these controlled holding/marshalling arrangements, vehicles and drivers will be subjected to CLOCS Checks and will be and will be briefed on the procedures set out in this CEMP. Drivers will remain with their vehicles unless they are using the common user facilities, including WCs, smoking areas, or rest areas, established for the comfort and safety of LHA users.
- Q.ii.32 Vehicles held within the LHA will be subject to a proportionate visual check for obvious leaks, spillages or other conditions that could cause environmental pollution before being released to the wider CEMP Land. Any vehicle identified as leaking or otherwise presenting an environmental risk will not be permitted to proceed until the issue is addressed. The Contractor will also require suppliers and hauliers, through contractual/supply chain controls, to ensure vehicles attending the CEMP Works are roadworthy and do not present a risk of environmental pollution.

iii Details and Phasing of Construction 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 CEMP Staff vehicles, HDVs, AILs and vehicles removing spoil or waste, unless specific restrictions or routing instructions are identified through the CLP/Transport Coordinator governance arrangements for safety or operational reasons.

Construction Workers

- Q.iii.2 The following management measures will be encouraged for how workers 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 Load Routes

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

HDV Route Compliance

- Q.iii.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.
- Q.iii.11 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.12 Arrangements for the removal of spoil or waste from the CEMP Land will follow the procedure noted in **Section I.ii**.
- Q.iii.13 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 The CLP/Transport Coordinator will monitor queueing, booking, movement caps and potential near-threshold conditions and will implement first-line corrective actions through the DMS, routing and logistics arrangements. The Central Site Manager will be notified where thresholds, near-threshold conditions or wider interface implications require tactical coordination.
- Q.iv.2 All 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 CEMP Land access arrangements to be implemented where necessary.
- Q.iv.3 The LHA/queueing/turnaround areas applicable to the CEMP Works are shown on **Figure Q-1**. These areas may comprise temporary or permanent hardstanding, crushed brick, dirt, or other construction surfaces, as applicable to the relevant phase of the CEMP Works.

- Q.iv.4 Where such areas are not located wholly within the immediate compound footprint, they will operate as controlled holding/marshalling areas in accordance with the DMS and CLP/Transport Coordinator's access-control and traffic-management arrangements set out in **Section Q**.
- Q.iv.5 Where operational holding arrangements are used rather than fixed dedicated hardstanding, these shall operate in accordance with the DMS, CLP/access-control and traffic-management arrangements set out in this section.
- Q.iv.6 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; and
 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.7 Unbooked deliveries or vehicles arriving outside their allocated slot will not be processed at the site entrance on the public highway. Such vehicles will be directed away from the access point to the appropriate pre-defined holding or marshalling location associated with the relevant construction access shown in **Figure Q-1**, or instructed to leave and await re-booking through the DMS, in accordance with the Construction Traffic Management Plan and the instructions of the CLP/Transport Coordinator.
- At Construction Access CA-2 (Broadmead Road into the West Gateway Zone), the existing marshalling/queuing and holding arrangements are established and operated by the Transport Coordinator/CLP. The current marshalling/queuing area has capacity for up to three HDVs, ensuring that vehicles can queue without backing up onto Broadmead Road. Beyond the marshalling area there is a LHA, and an internal turning arrangement enabling vehicles to leave the Order land safely and efficiently back onto Broadmead Road.
 - At Construction Access CA-3 (Broadmead Road into the Core Zone), a larger LHA will already have been established under prior CEMP Works to manage arrivals in coordination with the wider Transport Coordinator/CLP arrangements. The location, capacity and operation of this holding area will be planned through the Transport Coordinator/CLP logistics strategy and implemented by the Contractor as part of the CEMP Works.
- Q.iv.8 The operation of these queuing, marshalling, and holding areas will be governed through the CLP/Transport Coordinator, using real-time DMS information and local gate/marshalling supervision to monitor arrivals, occupancy, and call-forward to the relevant delivery point. An early warning trigger for intervention will apply where occupancy is approaching the available queuing or holding capacity at the relevant construction access such that further call-forward could create a risk of vehicles waiting, manoeuvring, or backing up towards the public highway. The action trigger for intervention will be when the available queuing or holding capacity at the relevant construction access has been reached, or where further call-forward of vehicles would create a risk of vehicles waiting, manoeuvring, or backing up onto the public highway.

- Q.iv.9 Where the early warning trigger is reached, the CLP/Transport Coordinator will moderate or suspend further call-forward to the relevant construction access, hold back vehicles not yet released through the DMS, and implement any additional marshalling/traffic management controls required to maintain safe operation and avoid highway impact. Where the action trigger is reached, no further vehicles will be processed into the relevant queuing/holding area until capacity becomes available. Vehicles not yet released through the DMS will be held back from travelling to the access point, and any vehicles arriving without a valid slot or instruction will be directed away from the access point and instructed to leave and await re-booking through the DMS. If required, the CLP/Transport Coordinator will resequence call-forward, temporarily suspend arrivals to the affected construction access, and implement additional traffic management/marshalling controls to maintain safe operation and avoid highway impact.
- Q.iv.10 Any instance where the action trigger is reached, or where there is a risk of queueing affecting the public highway, will be reported immediately through the CLP/Transport Coordinator governance arrangements to the CEMP Works Site Manager and Central Site Manager, and recorded as part of the CTMP monitoring and review process. Instances where the early warning trigger is reached repeatedly will also be reviewed through the CTMP monitoring and review process to determine whether further adjustments to call-forward, marshalling or holding arrangements are required.
- Q.iv.11 Repeat non-compliance by suppliers or hauliers may result in escalation through the CLP/Transport Coordinator procedures, including warning, re-briefing and removal of booking privileges where required.
- Q.iv.12 The DMS records will be used to monitor the HDV deliveries against the HDV limits set out in the following section.
- Q.iv.13 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.19.**

Capping of HDV Movements

- Q.iv.14 The Contractor and their Sub-contractor(s) will be encouraged to minimise HDV movements to the CEMP Land by means of consolidating payloads and aggregate supplies, through the following measures:
- Optimising the specification for the imported material; and
 - Maximising HDV payloads utilisation, where safe and practicable.
- Q.iv.15 The number of HDV movements that are permitted as part of the CEMP Works will be capped prior to the delivery of the new Woburn Road Roundabout, the West Gateway Roads and the new bridge over the Marston Vale Railway and necessary aspects of Public Road A (includes some form of road between those points). The proposed HDV movements cap is set out as follows:
- A cap of 500 HDV Deliveries per Day (or 1,000 movements two way) is proposed, in total, to and from all construction access points into the CEMP Land from the public highway which is the assessed number plus 10%; and
 - On Manor Road, east of the Marston Vale Railway Line, a cap of 3,035 passenger car unit movements is proposed, in total, based on the current (2023) level of vehicles on Manor Road.

- Q.iv.16 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.17 If monitoring indicates that the cumulative cap is at risk of being exceeded, the CLP/Transport Coordinator will implement the agreed default mechanisms, including restricting or rescheduling bookings, holding vehicles at designated holding areas (where applicable), and issuing corrective actions. Any exceedance (or near miss) will be recorded, reported to the CTMG, and subject to review and close-out actions to prevent recurrence.

Timing of Deliveries

- Q.iv.18 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 AILs, 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.
- Q.iv.19 Timing of deliveries will be managed through the DMS by the Transport Coordinator/CLP to avoid peak traffic pressure and congestion of public highways where practicable.

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

- Q.v.1 Recording and monitoring of construction traffic movement with adherence to the above identified routes will be implemented through DMS records, gate records and periodic checks as required to demonstrate compliance with the approved routes and caps. Measures for securing adherence to routing will include, as a minimum:
- DMS booking controls (refer to **Section Q.iv**);
 - Route maps and routing instructions issued through the DMS booking process;
 - Driver briefings/induction and reinforcement through signage/wayfinding (within the CEMP Land and, where agreed, on approach routes);
 - Monitoring and reporting of breaches, as outlined in **Paragraphs Q.ii.13 to Q.ii.14** (including escalation through CTMG governance where applicable); and
 - Default mechanisms/corrective actions for non-compliance (refer to **Paragraph Q.ii.23 to Paragraph Q.ii.25**).

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;
- Cycle parking facilities will be provided within the CEMP Land at the relevant site compounds for use by CEMP Staff and are shown on the compound layout plans in **Appendix B**, including **Appendix B(1) – Stage 1 Broadmead Road Compound** and **Appendix B(2) – Stage 2 Broadmead Road Compound**;
- Utilisation of a car sharing digital application; and
- Increased frequency or additional public transport services.

Q.vi.4 Due in part to the minimal availability of public transport, it is anticipated that a substantial percentage of CEMP Staff will choose to drive personal or company vehicles. All these vehicles will therefore need to be registered at the point of induction.

Q.vi.5 To ensure that reliable emission data can be captured, 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 promoting and supporting sustainable transportation for CEMP Staff, including:

- Implement proportionate arrangements to capture workforce 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 All vehicles leaving the CEMP Land will pass through the designated wheel cleaning facilities where required by ground conditions, and the CEMP Works Site Manager/Transport Coordinator will ensure that vehicles are checked before exiting where there is a risk of mud or debris being carried onto the public highway.

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

- Q.vii.3 All Track-out prevention measures will be delivered through a combination of Contractor-controlled wheel cleaning within the CEMP Land and Transport Coordinator/CLP managed communal road cleaning/shared logistics controls outside contractor-specific demises, as agreed through the logistics arrangements in force at the time.

viii Emergency Access (Procedure)

- Q.viii.1 Emergency services are to utilise the existing 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 will 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 CEMP 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 CEMP Land access points.

ix Protection of Rail Assets (Procedure)

- Q.ix.1 Any CEMP Works within the 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 CEMP Works within the NR interface area, including those shown as adjacent to operational railway on **Appendix A: CEMP Land Boundary (OS Plan)**, remain subject to separate NR approvals, Works Package Plans, and safe systems of work. Endorsement of this CEMP by the Secretary of State should not be taken to confer endorsement of, or remove the need for, those separate Network Rail approvals and decisions.
- Q.ix.3 For the purposes of this CEMP, the NR interface area comprises those parts of the CEMP Land where the CEMP Works are adjacent to, over, under or otherwise capable of affecting operational railway land, railway drainage, level crossings, lineside fencing, structures, signalling/telecoms, or plant and equipment operating in proximity to those assets. The NR interface area is shown on **Appendix A**. In addition to the general NR approval requirements set out above, the following controls will apply where works are undertaken within or adjacent to the NR interface area:
- No stockpiles, plant or temporary works will be positioned within the NR interface area unless specifically permitted through the agreed NR approvals/WPP/SSoW;

- Stockpiles adjacent to NR assets will be subject to defined limits, drainage controls, plant operating restrictions, demarcation, and inspection requirements to prevent instability, runoff or encroachment affecting the railway;
- Exclusion zones, plant stand-offs, and any height restrictions will be established before works commence and will be briefed to all relevant CEMP Staff; and
- Any changes to stockpile locations, traffic management extents or plant operations near the railway will be subject to change control and agreed with NR prior to implementation.

Q.ix.4 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.5 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.6 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.7 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 The Contractor and Site Controller will seek to reduce the greenhouse gas impacts of the CEMP Works by applying the PAS 2080:2023 carbon reduction hierarchy to the extent relevant to the CEMP Works. In practice, this means seeking first to avoid unnecessary carbon-generating activities, then to reduce emissions through efficient planning, procurement, and delivery, before considering lower-carbon alternatives where practicable and proportionate.
- R.i.2 The layout of compounds, stockpiles, haul routes, refuelling areas, and welfare locations will be organised so far as practicable to minimise unnecessary travel distances, double handling of materials, plant idling, and avoidable fuel consumption during the CEMP Works. Delivery planning, routing, and holding arrangements under the CTMP will be used to reduce unnecessary vehicle movements, queuing, and associated emissions.
- R.i.3 Procurement and supply chain decisions relevant to the CEMP Works will, where proportionate, take account of greenhouse gas impacts. This will include seeking opportunities to reduce embodied carbon through efficient material use, favouring lower-carbon or recycled-content materials where safe and suitable for the relevant engineering purpose, favouring local or shorter-distance supply where practicable, and requesting supporting carbon/environmental information such as Environmental Product Declarations or equivalent evidence where available and proportionate to the purchase.
- R.i.4 A proportionate record of greenhouse gas reduction actions and related supporting information will be maintained for the CEMP Works, using data and records that are reasonably available through normal project delivery and reporting processes. This may include, where relevant and available, information such as plant and fuel use, temporary power/energy consumption, delivery and haulage movements, significant material quantities, and waste/reuse/recycling information. The record will be reviewed from time to time by the Contractor's Environmental Manager and the Central Site Manager so that further practicable reduction opportunities can be identified and implemented where appropriate, with summary updates captured through routine project reporting.
- R.i.5 Illustrative measures that may be used, where relevant and proportionate to the CEMP Works, include but are not limited to:
- Using modern and efficient construction plant and delivery vehicles, including electric or alternative / lower-carbon fuelled plant where practicable;
 - Selecting temporary mechanical and electrical equipment (such as lighting and telecommunications) that is durable and energy efficient;
 - Favouring lower-embodied-carbon and recycled-content materials where safe and suitable for the relevant engineering purpose;
 - Reducing avoidable transport and handling emissions through efficient sourcing, delivery planning, and on-site material handling; and
 - Maximising reuse and recycling of materials and arisings where practicable so as to reduce waste and landfill disposal.
- R.i.6 This procedure is necessarily focused on the greenhouse gas impacts that can be influenced at the CEMP Works stage. More detailed carbon-reduction measures relating to the design and delivery of

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

OTHER MATTERS (PROCEDURE)

i Cultural heritage and archaeology

The CEMP Works will not affect the Kempston Hardwick moated site and therefore this section has been omitted from this CEMP.

ii Cumulative Impacts (Procedure)

Cumulative Impacts protocol

In accordance with Condition 12(9) of the SDO, the Site Controller will take an active role in the governance, escalation, and coordination of potential cumulative impacts across the Order land as a whole. The Site Controller will act to avoid/minimise/mitigate cumulative impacts that may arise due to concurrent CEMP Works from distinct/separate CEMP Land parcels so far as reasonably practicable.

The Site Controller will manage such cumulative impacts through the command, governance and escalation framework set out in this section, applied across the Order land as a whole. This includes the local/tactical/strategic escalation hierarchy, the central reporting/review arrangements, the coordination of submitted CEMPs, and the wider systems governing compounds, traffic, monitoring, and package interfaces across the site.

The mechanisms for doing so may include, but are not limited to:

- The central reporting, escalation, and review regime;
- Weekly reporting and coordination processes;
- Construction traffic control systems and cumulative vehicle caps, including DMS booking/holding/intervention arrangements under **Section Q**;
- The coordination of compounds, logistics areas and shared operational interfaces shown on the revised **Appendix B** plans, including **Appendix B(1) – Stage 1 Broadmead Road Compound** and **Appendix B(2) – Stage 2 Broadmead Road Compound**, where applicable;
- Noise and vibration monitoring, trigger/action levels, mitigation, and exceedance response under **Section D**;
- Dust and air-emissions monitoring, trigger/action levels mitigation and exceedance response under **Section E**; and
- Environmental monitoring schedules and package coordination measures where cumulative or concurrent effects are identified.

Potential cumulative impacts will be assessed and identified prior to the commencement of CEMP Works. Should any cumulative impacts be identified the Site Controller will take appropriate actions to ensure that they are minimise/mitigated as far as reasonably practicable.

Cumulative Impacts of CEMP Works

The following CEMP Works have been included in the cumulative impact assessment:

- Temporary Roads and Accesses CEMP Works (CEMP3.1 – UDX – C12 – Temporary Roads and Accesses CEMP – Rev 01):

- CEMP Works: No effect - Mass Grading Phase 2 CEMP Works will not be directly affected by the Temporary Roads and Accesses CEMP Works. Mass Grading Phase 2 CEMP Works will be limited to the West Gateway Zone and a small section of the Core Zone to the West. Access prior to the completion of Temporary Roads and Accesses CEMP Works will be via existing access. For Following completion of Temporary Roads and Accesses CEMP Works the entire Mass Grading CEMP Works Boundary will be utilised.
- Site Compound: No effect - The Broadmead Road Compound will be used for both the Temporary Roads and Accesses CEMP Works and Mass Grading Phase 2 CEMP Works while the Manor Road Site Compound within the Logistics Hub will not be used for the Mass Grading Phase 2 CEMP Works. The Broadmead Road site Compound Road will be expanded as part of Stage 2 (see **Appendix B(2)** for details) to ensure there is sufficient capacity to support both CEMP works, avoiding cumulative effects.
- Mass Grading CEMP Works (**CEMP4.1- UDX - C12- Mass Grading (WV) CEMP - Rev 01**):
 - CEMP Works: No effect -The Mass Grading Phase 2 CEMP Works will not be directly affected by the Mass Grading CEMP Works. Mass Grading Phase 2 CEMP Works will be limited to the West Gateway Zone and a small western part of the Core Zone. There is a small section where the CEMP Works Boundaries overlap in the western part of the Core Zone, in this area there are no planned concurrent works. Installing exclusions zones and segmented phasing of works will ensure that there is no concurrent working in the overlapping area. The overlapping CEMP Land Boundary is depicted in **Appendix B(6) – Overlapping CEMP Land Plan**.
 - Site Compound: No effect - The Core Zone Compound within the Logistics Hub and Lake Zone Compound will not be used for the Mass Grading Phase 2 CEMP Works.

The Site Controller will manage the deliveries and CEMP Works traffic as detailed in **Section Q** to ensure there are no cumulative impacts.