HM Revenue & Customs

Department for Transport

Department for Environment Food & Rural Affairs

Sevington Inland Border Facility

Construction Management Plan

December 2021

Confidential

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1 The Project

1.1 Introduction

Mott MacDonald has been appointed by the Department for Transport (DfT) to produce a Construction Management Plan (CMP) for the proposed use of a site at Sevington near Ashford in Kent (hereafter referred to as 'the site') for a temporary Inland Border Facility (IBF) (hereafter referred to as 'the scheme').

This CMP sets out the Environmental Management Requirements for the site, which would enable the Client to comply with current legislation and their respective environmental policies. This CMP is to be used by and is the responsibility of the Principal Contractors (Gallagher Group & ES Global Solutions ('ESG')/Amey[1]) for the duration of their contract.

Gallagher Group are responsible for the wider site construction activities on site. ESG/Amey are responsible for the construction of the Department for Food and Rural Affairs (Defra) Border Control Post (BCP).

The Principal Contractors would comply and continually review all relevant legislation, codes of practice, and associated information documentation to ensure compliance.

The CMP would ensure:

- Compliance with all relevant Environmental Legislation.
- Accommodation of all newly identified Environmental Issues appropriate to their environmental significance and impact.
- Design and implementation of appropriate mitigation measures and controls.
- Ongoing monitoring of the effectiveness of mitigation measures, controls, and the Environmental Management System.
- Auditing environmental performance.

The Principal Contractors would take responsibility for this document and its further development as necessary throughout the project life cycle.

Although much of the construction of the scheme has already been completed, in order for completeness and to ensure a precautionary approach is used within the CMP, all requirements have been included within this CMP, assuming no works have taken place.

1.2 Regulatory Framework and Planning Conditions

The United Kingdom (UK) has left the European Union (EU) and a transition period was in place until 31 December 2020. The transition period was a timeframe in which the UK and EU negotiate a future trading relationship, as the UK's membership of both the Single Market and the Customs Union came to an end. The previous rules on trade, travel, and businesses for the EU and UK continued to apply during the transition period until new rules were brought into effect as of 1 January 2021.

With the new rules in place, there is a greater requirement for inland border infrastructure. This includes providing facilities to provide checks on goods moving under a Common Transit

[1] ES Global Solutions and Amey are both Principal Designer and Principal Contractor for the Defra BCP under a design and build (D&B) contract.

Convention and providing customs checks on non-transit imports and exports (including sanitary / phyto-sanitary checks where required).

Given the national importance of the timely delivery of border infrastructure, a Special Development Order (SDO) has been made under the provisions of S.59 of the Town and Country Planning Act 1990. The SDO specifically is the *Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020.*

The SDO granted temporary planning permission for development consisting of the use of land in specified parts of England for border processing and the associated stationing of vehicles entering or leaving the UK, and the provision of facilities and infrastructure associated with this use.

The SDO required a further site-specific 'Relevant Approval' from the SoS for Department for Levelling Up, Housing and Communities (DLUHC) for the use of the land and operations comprised in the development. Proposals granted under this SDO, grant temporary planning permission until 31 December 2025 (unless a shorter duration is specified) for the use of the site for customs management and would require reinstating by 31 December 2026 (unless an earlier date is specified).

Relevant Approval 1 was previously granted by the SoS for up to 1272 Heavy Goods Vehicle (HGV) spaces for an IBF and associated border processing infrastructure on the site on 1 December 2020. A further Relevant Approval was also granted 23 December 2020 with supplementary material submitted to cover the change associated with the temporary dual operation of the Waterbrook and Sevington IBFs from 1 January 2021 until 28 February 2021, which has subsequently lapsed. An assessment was undertaken (*document ref: 419419-MMD-XX-SV-RP-YE-0003 - P02*) to assess the simultaneous operation of the Waterbrook IBF and the Sevington IBF for the temporary two-month period. The cumulative operational assessment concluded that there would be no significant environmental effects from the dual operation for the temporary two-month period, and therefore, no additional mitigation was required.

This CMP is associated with the Relevant Approval 3, which was granted on 24 November 2021, and is submitted to the SoS for determination as required by Schedule 2, Part 2 of the SDO.

1.2.1 Article 4 Submission – Compliance Summary

Part 2 of the SDO states the following:

1. *'No works of construction may commence until a construction management plan for the development has been submitted to and approved by the Secretary of State. The plan must comprise details of policies and procedures to be complied with in connection with the construction of the development in relation to:*

   a) *engagement with relevant owners and occupiers, including complaints handling;*
   b) *application of best practicable means to minimise noise, vibration and emissions to air;*
   c) *application of best practicable means to minimise the adverse effects of lighting on the amenity of relevant owners and occupiers, ecological receptors and road users;*
   d) *sourcing, placing, managing and storing of construction materials, including, where appropriate, the stripping, storage and re-spreading of soil;*
   e) *management of waste in accordance with the waste hierarchy;*
   f) *pollution prevention and control*

g) preventing damage to trees to be retained on the site, or trees immediately adjacent to any works on the site;
h) management of construction traffic, including measures to prevent the deposit of mud and construction materials on the highway;
i) the management of invasive species; and
j) where appropriate, the appointment and retention of a suitably qualified archaeologist, arboriculturist, ecologist or ordnance specialist to oversee works '

2. A copy of the CMP must be kept on the site at all times.

3. The site operator must publish a non-technical summary of the CMP.

Table 1.1 explains where the required information is provided in this CMP.

Table 1.1: Part 2 Construction Compliance Summary

Policies and Procedures to be complied with		Location within report (Section)
1(a)	Engagement with relevant owners and occupiers, including complaints handling.	Section 3 (all paragraphs)
1(b)	Application of best practicable means to minimise noise, vibration and emissions to air.	Section 4.3 (air) and section 4.11 (noise and vibration)
1(c)	Application of best practicable means to minimise the adverse effects of lighting on the amenity of relevant owners and occupiers, ecological receptors and road users.	Section 4.10 (lighting), section 4.7 (ecology)
1(d)	Sourcing, placing, managing and storing of construction materials, including, where appropriate, the stripping, storage and re-spreading of soil.	Section 4.6
1(e)	Management of waste in accordance with the waste hierarchy.	Section 4.14
1(f)	Pollution prevention and control.	Section 4.12
1(g)	Preventing damage to trees to be retained on the site, or trees immediately adjacent to any works on the site.	Section 4.9
1(h)	Management of construction traffic, including measures to prevent the deposit of mud and construction materials on the highway.	Section 4.13
1(i)	The management of invasive species.	Section 4.7
1(j)	Where appropriate, the appointment of retention of a suitably qualified archaeologist, arboriculturist, ecologist or ordnance specialist to oversee works.	Section 4.7 and section 5.2
2	A copy of the CMP must be kept on the site at all times.	Section 1.6
3	The site operator must publish a non-technical summary of the CMP.	Section 1.6 and Appendix A

In addition, Schedule 2 Parts 1(b) and 1(c) of the SDO set out conditions that are to be complied with during construction, operation and reinstatement of the development. Sections of the CMP which demonstrate compliance with these conditions is set out in Table 1.2.

Table 1.2: Part 1B Compliance Summary

	Policies and Procedures to be complied with	Location within report (paragraph)
Part 1B		
1.	Any artificial lighting must be arranged so the main beam angle of each installation is directed downward and away from the closest boundary so as to minimise light spill.	Section 4.10
2.	Any fire hydrants and emergency water supplies must be kept in good repair and any defects must be repaired as soon as practicable.	Section 4.8
3.	Any surface water and foul water system must be kept in good repair.	Section 4.12 and section 4.15
4.	Temporary structures collecting sewage that are not attached to mains sewers must be emptied regularly.	Section 4.12 and section 4.15
5.	Development must not adversely affect any ancient or veteran trees.	Section 4.9
6.	There must be no net increase in the rate or volume of surface water discharge from site.	Section 4.12 and section 4.15
7.	Surface water discharged from the site must not adversely affect the quality of receiving water bodies.	Section 4.12 and section 4.15
8.	Subject to condition B.9, the height of any building (other than an existing building) must not exceed 15m.	Section 4.9
9.	The height of any gate, fence, wall or other means of enclosure erected or constructed, other than noise attenuation measures, must not exceed 4.5m.	Section 4.9
10.	No building other than plant, machinery, gates, fences, walls or other means of enclosure, or noise attenuation measures, may be erected or extended within 25m of the boundary of the curtilage of any residential dwelling.	Section 4.9
11.	Where there is a risk of groundwater contamination, hard surfacing must not be made of porous materials.	Section 4.15
12.	Where a condition in Parts 2 to 4 requires the site operator to publish any document, the site operator must take reasonable steps to make that document available to persons likely to have an interest in the matters to which the document relates.	Please refer to site Operational Management Plan (OMP)
Part 1C		
1.	The stationing of vehicles is only permitted on hard surfacing.	Section 4.12
2.	When stationed, a goods vehicle must not have its engine idling without the express authority of the site operator.	Section 4.3

The Sevington, Ashford Relevant Approval granted on 24 November 2021 was approved subject to 14 planning conditions as provided in Table 1.3 below.

Table 1.3: Site-Specific Conditions

Condition No.	Scope	Condition	Relevant section with CMP
1	Overarching Condition	The use of the site for the purposes in Article 3(1)(a) and (b) of The Town and Country	N/A

Condition No.	Scope	Condition	Relevant section with CMP
		Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 (the Order) authorised by this approval shall not be carried out other than in accordance with the conditions specified in Schedule 2 of the Order.	
2	Operation commencement	The use authorised by this relevant approval shall not commence prior to 1 January 2022. No use or operations shall take place at the site after this time under any relevant approval pursuant to Article 4 of the Order given prior to the date of this decision.	N/A
3	CMP Register of Environmental Actions and Commitments (REAC) Requirements	The measures detailed in row AQ1, CH1, LVE1, LVE2, LVE3, LVE4, GS1, GS2, B1, B2, B3, B6, B8, M1, M2, M3, M4, NV1, NV2, NV3, PH1, RDWE1, RDWE2, C1 and CH4 of the Register of Environmental Actions and Commitments (Table C.1 of Annex C, Analysis of Likely Environmental Effects of the Development) (the REAC) must be included as part of the Construction Management Plan to be submitted for approval.	Measures throughout the CMP, references to relevant sections included within Table 1.4
4	OMP REAC requirements	The measures detailed in row TT1, M4, NV4, NV5, B8, B10, RDWE2 and C2 of the REAC must be included as part of the Operational Management Plan to be submitted for approval.	N/A
5	Reinstatement Plan REAC requirements	The measures detailed in row CH3, LVE3, LVE4, LVE6, GS2, B8, B9, M2, NV1, NV2, PH1, RDWE1, C1 and C3 of the REAC, the retention of the landscaping and environmental improvement works set out in Drawing No. 419419-MMD-01-MO-DR-C-0182 rev P08 and Drawing No. 419419-MMD-01-MO-DR-L-3032 rev P05 and details of management and maintenance for soft landscaping and other biodiversity enhancement measures as set out within the Landscape Environmental Management Plan Drawing No. 419419-MMD-01-MO-DR-L-3031 P08, and the permanent site access to the A2070 shown on Drawing No. 419419-MMD-01-MO-DR-C-0110 P05 must be included as part of the Reinstatement Plan to be submitted for approval on or before June 2025.	N/A
6	Stockpiled materials	There shall be no storage of the material stockpiled on land east of Highfield Lane, as shown on approved drawing 419419-MMD-01-MO-DR-C-0028 P05, beyond 31 July 2022.	N/A
7	Stockpiled materials	Prior to 31 March 2022, a strategy for the long term management of all land within the reline boundary east of Highfield Lane, including the future use of material stockpiled as shown on approved drawing 419419-MMD-01-MO-DR-C-0028 P05, shall be submitted to the Secretary of State in writing. The future use of stockpiled material shall only be used in accordance with the approved strategy.	N/A

Condition No.	Scope	Condition	Relevant section with CMP
8	Construction compound	Prior to March 2022, the construction compound at and east of Highfield Lane, shaded purple on drawing 419419-MMD-01-MO-DR-C-0182 P08, shall be removed in its entirety.	N/A
9	External appearance of structures	Details of the design and external appearance of buildings and facing materials proposed must be included as part of the Construction Management Plan to be submitted for approval.	Section 1.3.2
10	Waste or foul water effluent	Measures to ensure that waste or foul water from the development does not adversely affect the Stodmarsh sites must be included in the Construction Management Plan and the Operational Management Plan to be submitted for approval. Any waste or foul water that is tankered offsite must be taken to a wastewater treatment works outside of the Stour Valley catchment.	Section 4.12 and Section 4.15
11	Tradewaste/ tradewater discharge	No discharge of any tradewaste/tradewater (Non-human) into any existing drainage system shall take place at areas identified as Defra Development Plot Area (hatched in purple) and HGV Bays Reserved for Container Trailer Parking for POAO & APHA (24No.) (hatched in blue) on approved drawing 419419-MMD-01-MO-DR-C-0182 P08 unless approved inwriting by the Secretary of State.	Section 4.12
12	Emergency use of Plots E and F	Plots E and F as shown on approved plan 419419-MMD-01-MO-DR-C-0182 P08 shall not be used other than during an on-site systems failure, during significant repair and/or maintenance work on-site or for traffic management purposes under the Civil Contingencies Act 2004. Lighting columns within these Plots shall not be used other than in association with these purposes.	N/A
13	Enhanced directional signage	Within three months of the date of this relevant approval, details of enhanced directional signage to the Border Facility installed along the strategic highway network (M20 approaches) to the site shall be submitted to the Secretary of State.	N/A
14	Sleeping accommodation	The approved buildings shall at no point be used for sleeping accommodation for goods vehicle drivers attending the Inland Border Facility.	N/A

In response to Condition 3, Table 1.4 overleaf sets out the actions required from the Record of Environmental Actions and Commitments (REAC) that are applicable to this CMP and were contained within in the Analysis of Likely Environmental Effects of the Development Report (Document Reference: 418703-MMD-XX-SV-RP-YE-0002 P05) approved as part of the Article 4 Relevant Approval.

Table 1.4: REAC

REAC Ref.	Actions	Location within CMP
AQ1	Works would be carried out in accordance with Best Practicable Means, as described in Section 79 (9) of the Environmental Protection Act 1990, to reduce the creation of dust on-site. This would include: • Minimise height of stockpiles and profile to minimise wind-blown dust emissions and risk of pile collapse. • Locate stockpiles out of the wind (or cover, seed or fence) to minimise the potential for dust generation. • Ensure that all vehicles with open loads of potential dusty materials are securely sheeted or enclosed. • Enforce a maximum speed limit of 15mph on surfaced roads and a 10mph speed limit on unsurfaced haul roads and work areas, to prevent the generation of dust by fast moving vehicles. • Damp down surfaces in dry conditions. • All vehicle engines and plant motors shall be switched off when not in use.	Section 4.3
CH1	Archaeological investigation in line with the Stour Park Development Written Schemes of Investigation, including: • Strip, map and sample of areas west of Highfield Lane which were identified by the previous development application. • Trial trenching of the area south of Highfield Lane.	Section 4.4
CH2	• Implementation of the design measures and landscaping planting included in the Environmental Masterplans (drawing ref: 419491-MMD-01-MO-DR-L-3030 and 419491-MMD-01-MO-DR-L-3031).	Section 4.4
CH4	• Archaeological Investigation, as agreed with KCC, of the eastern field to include the eastern compound and stockpile area.	Section 4.4
LVE1	• Prioritise the bund creation early in the construction period to aid screening of lower level activity. • Seeded as priority to ‘green up’ earthworks.	Section 4.9

REAC Ref.	Actions	Location within CMP
	• Implementation of planting in the first planting season to aid the integration of the scheme with the surrounding landscape.	
LVE2	• Stockpile must be kept to a maximum 2m in height. • Locate stockpiles as far away as possible from properties on Kingsford Street. • The 'active' side of the stockpile should be restricted to the western edge, adjacent to Highfield Lane which would aid screening of any soil and plant movements. • Stockpile should be seeded as a priority. The remaining faces of the stockpiles should be left inactive to limit visual intrusion upon neighbouring residential receptors.	Section 4.9
LVE3	• Site task lighting should be kept to a minimum, be directional and use for the minimum time required. • Explore the use of infrared initiated security lighting to minimise night-time lighting.	Section 4.9
LVE4	• Keep a well-managed and tidy site, with construction materials delivered on an as and when needed basis to reduce material stockpiles on-site	Section 4.9
GS1	• The stockpile should be managed in line with the Department for Environment, Food and Rural Affairs (Defra) Construction Code of Practice for the Sustainable Use of Soils on Construction sites. • The stockpile must be removed by 31 July 2022. • The stockpile should be seeded to maintain quality of soil.	Section 4.6
GS2	• Should any hazardous materials be encountered during construction, all materials would be dealt with in accordance with appropriate guidance. • Any fuels, oils or hazardous materials used during the works would be appropriately stored and kept in bunded areas to prevent pollution of surface and ground waters. Spill kits shall be provided on-site for the duration of the works and construction staff trained in their correct application.	Section 4.12
B1	• Best practice measures would be employed on-site to minimise impacts due to construction noise, dust	Section 4.7

REAC Ref.	Actions	Location within CMP
	and water pollution as far as possible in line with AQ1, NV2 and RDWE1. • Ensure lighting is minimised to avoid light spill on habitats for dormice in the habitat surrounding the construction area. • Careful siting of haul routes, materials storage areas, compounds, lighting and generators away from sensitive habitats. • Night-time working would not be allowed during the months when bats are actively foraging (April to October inclusive) to prevent lighting disturbance to foraging bats.	
B2	• Existing trees and vegetation to be retained (including hedgerows) would be protected during the construction phase with protective fencing. • Protective barriers should be installed in accordance with BS5837:2012 around all of the trees and groups that are due to be retained, at the distances dictated by the root protection area (RPA) dimensions stated in Table 3.4 of the Stour Park Pre-Development Arboricultural Survey (Document Ref: RT-MME-120243-08) to protect these trees. • An Arboriculturalist should attend site prior to commencement of the works to confirm the final positioning of the protective barrier. • For the location and alignment of the temporary protective barriers required for the additional trees and groups that have been removed or retained as part of the Sevington Inland Border Facility (IBF) works, refer to the Tree Protection Plans (418703-MMD-XX-SV-VS-YB-0001-04). For the location and alignment of the temporary protective barriers required for trees and groups that have not changed, refer to the Stour Park West Arboricultural Impact Assessment. • The area within the protective barriers i.e. tree side, would be a 'Construction Exclusion Zone' (CEZ) for the duration of the works. • All weather notices should be erected on the barrier with words such as: "Tree Protection Area — Keep out".	Section 4.7

REAC Ref.	Actions	Location within CMP
	• The following prohibitions shall also apply within the area enclosed by the temporary protective barriers: – No mechanical digging or scraping – No storage of plant, equipment or materials – No vehicular or plant access – No fire lighting within 10m of tree canopies – No handling, discharge or spillage of any chemical substance, including cement washings and vehicle washings within 10m – No action likely to cause localised waterlogging – No alteration of ground levels – No construction of hard surfaces – No attachment of boards, hoarding, cables or notices or fencing to trees – No storage of excavated materials • Special care is to be taken on sloping ground where spillages could run towards the trees. A collecting channel dug along the outer line of the protective fencing would be one method of avoiding such damage. • If excavators are to be used during construction, at no time is the excavating arm to encroach over the position of the tree protection barriers. • All construction compounds, storage facilities and deliveries must aim to make use of existing hard surfaces to avoid unnecessary compaction within RPAs. If compounds require siting within RPAs, appropriate footings or ground cover must be used to avoid root damage or compaction of the soil and siting must ensure that any damage to aerial parts of retained trees is avoided.	
B3	• A Reptile Mitigation Strategy would be implemented in order to protect the reptile populations during construction. The following methodologies and techniques would be used prior to construction commencing: – Receptor site review – Habitat manipulation – Trapping and translocation	Section 4.7

REAC Ref.	Actions	Location within CMP
	– Supervised soil strip – Sensitive timing of works • Worker awareness and sympathetic working practice	
B6	• Vegetation clearance would be programmed to avoid the nesting bird season (March – August inclusive) if possible. • Where this is not possible a breeding bird survey would be carried out by an ecologist 48-hours in advance of proposed clearance works to check for bird nesting activity. • If active nests are found a buffer of vegetation shall be retained until all young have fledged and the nest is deemed inactive by an ecologist.	Section 4.7
B8	A five-year aftercare to follow completion of the works. Maintenance activities to be undertaken to ensure the successful establishment of planting and provision of new function habitats. This would include the replacement of defective plants.	Section 4.7
M1	• Re-use site won materials where possible. • Use locally sources materials. • Ensure materials are delivered on an as and when basis to avoid damage or contamination. • Use pre-cast elements where possible.	Section 4.6
M2	• Where possible, ensure that the waste hierarchy is followed when dealing with waste on-site: prevention, reuse and preparation for re-use, recycle, recovery, and disposal. Opportunities include: – Re-use of excavated soils on-site – Chipping green waste for use in the landscaping – Re-use of surplus excavated materials on other nearby schemes or for uses with benefits to the environment, such as in the restoration of nearby quarries or other excavation-sites	Section 4.6
M3	Production of a Materials Management Plan for the re-use of excavated material on-site.	Section 4.6

REAC Ref.	Actions	Location within CMP
M4	• Ensure waste bins are appropriately sized and placed throughout the operational area. • Ensure principles of waste hierarchy are adhered to.	Section 4.6
NV1	All noisy operations would be completed between 08:00 and 18:00 on weekdays, and 08:00 to 13:00 on Saturdays, switching off noise-emitting equipment when not in use and the use of temporary noise barriers where appropriate. Where out of hours working is required, prior agreement would be sought with Ashford Borough Council.	Section 4.11
NV2	Implement the following noise mitigation measures during construction: • Ensure equipment is maintained, in good working order, and is used in accordance with the manufacturer's instructions • Fit equipment with silencers or mufflers • Manage deliveries to prevent queuing of site traffic • Do not leave plant running unnecessarily • Careful orientation of plant with directional features • Materials to be lowered instead of dropped from height • Use of adjustable or directional audible vehicle-reversing alarms or use of alternative warning systems (for example, white noise alarms) • Train and advise members of the construction team during toolbox talk briefings on quiet working methods • Erect temporary barriers to fully obscure the construction works from nearby receptors	Section 4.11
NV3	• Position stockpiled material closest to the residential receptors first to ensure a bund between the works and the receptors is formed.	Section 4.11
PH1	• Ensure local community are informed of the proposals. • Ensure Public Right of Way (PROW) diversions are appropriately posted.	Section 4.13
RDWE1	Activities must be managed in accordance with CIRIA (Construction Industry Research and Information	Section 4.12

REAC Ref.	Actions	Location within CMP
	Association) Guidelines. Guidance on best practice in relation to pollution prevention and water management is set out in the following documents: • *CIRIA's Environmental good practice on-site*[2] • *Environment Agency's Protect groundwater and prevent groundwater pollution*[3] Measures to be implemented to limit the impact of construction activities on the water environment include: • All construction workers to be briefed on the use of spill kits as part of the site induction • Any stockpiled materials to be stored within enclosed areas to enable the run-off to be stored and treated where required • All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas • Pollution prevention and spill response procedures to be developed by the contractor and a spill kit and clean up equipment maintained on-site • Dust suppression measures as described in AQ1 of this REAC	
RDWE2	During autumn and winter months, extra vigilance shall be required to avoid silt run off and its impact on the drainage system from construction activities. This shall include cut-off ditches for landscape not established, seeding to retain topsoil, grass or vegetation to restrain silt run-off. The control of silt runoff is to be included as part of site wide maintenance regimes.	Section 4.12
C1	The carbon reduction principles as detailed within Section 3 of the Carbon Assessment and Reduction Report, would be considered including the following: • Transportation of materials to site would prioritise low-carbon modes where possible • Where possible, low-carbon construction materials and products would be preferred	Section 4.5

[2] CIRIA (2015) *Environmental good practice on-site guide.* ISBN: 978-0-86017-746-3.

[3] Environment Agency (2017) *Protect groundwater and prevent groundwater pollution.* Available at: https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution

REAC Ref.	Actions	Location within CMP
	• Where possible low-carbon construction plant and equipment would be used • Provision would be made to enable waste to be effectively segregated during construction, enabling materials to be effectively managed using the waste hierarchy, prioritising re-used and recycling over disposal • Circular economy principles, such as Modern Methods of Construction, would be implemented, where possible	

1.2.2 Prior Notification of Commencement of Work

Part 2 of the SDO also states '*Prior notification of the intended commencement of development must be given to the Secretary of State and the relevant local planning authority, and as such notification must include -*

(a) The address and location of the development (including a site plan in the form prescribed by article 4(2)(b));
(b) The name and address of the owner of the site;
(c) A description of the development; and
(d) The date on which it is intended that any material operation (as defined in section 56 of the Town and Country Planning Act 1990 (a)) would first be carried out

Notification of the intended commencement of the development was already given to the SoS under Relevant Approval 1.

1.3 Project Description

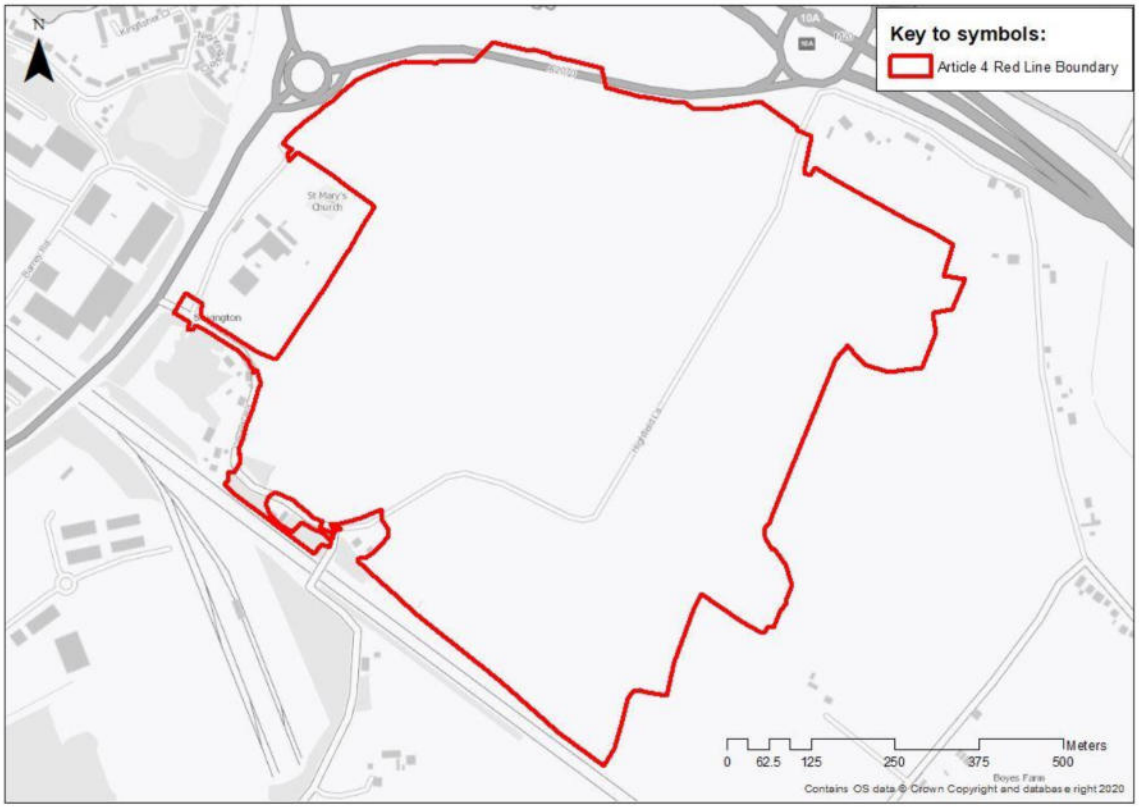
The scope of the CMP related to all the works carried out on the project. This includes:

- Project Management and Construction
- Environmental Management
- Design, construction and commissioning
- Quality Management

1.3.1 Site Location

The site is in a strategic location near the M20 Junction 10a, south of Ashford between Sevington and Mersham. The land is divided into two distinct parcels divided by Highfield Lane running north to south. The land which is the subject of the Article 4 submission is principally focussed on the western parcel which comprises 48ha of agricultural land, with all operational facilities limited to land west of Highfield Lane. A further 19.58ha of land to the east of Highfield Lane has been included in the Article 4 Red Line Boundary (*drawing ref: 419419-MMD-00-MO-DR-Z-0002 – P03*) in order to authorise the temporary stockpiling of material necessary for the earthworks and associated bunding and landscaping, which will be removed no later than 31 July 2022. There is also a smaller portion of land to the south adjacent to the railway line, made up of woodland included within the Article 4 Red Line Boundary. This small portion of land would be used for drainage and strategic utilities required to support the use of the site. In total the land subject to the Article 4 submission would be 67.58ha and is shown on plan Article 4 Land Plan (*drawing ref: 419419-MMD-00-MO-DR-Z-0002 – P03*) edged in red. The location of the site can be seen in Figure 1.1 below.

Figure 1.1: Site Location Plan



Source: Mott MacDonald (2020)

The M20 motorway runs to the east of the site from Folkestone towards London. The M20 Junction 10 is located approximately 250m north-west, and the new M20 junction 10a, now approaching completion, is located approximately 80m north-east. The A2070 is approaching construction completion and is located north of the site connecting an existing section of the A2070 to the new M20 Junction 10a. The site is also bounded by Church Road and the rail link for the Channel Tunnel to the south. Residential properties are present along Church Road and further east along Kingsford Street.

The local area is a mixture of residential, commercial and agricultural land use. Ashford, specifically Willesborough, is the main settlement located 100m west of the site. The existing land use and character of the area is a mixture of commercial and light industry in nature. Within the wider area, the William Harvey Hospital is located approximately 660m north of M20 Junction 10.

Immediately to the west of the site is the Church of St Mary, a grade I listed building, and the Milbourn Equine Centre. Numerous grade II listed buildings are located on the site's southern boundary along Church Road and Hatch Park Registered Park and Garden is situated approximately 390m north-east of the scheme at its closest point. The Church of St Mary has a significant visual relationship with the Church of St John the Baptist in Mersham, which is also a grade I listed building. Visibility between the spires of the two churches is maintained on the route of the public footpath that runs across the site as described below. As such, the central corridor of the site along the route of this footpath is termed as the 'viewing corridor' between the two churches.

There are four PROW within the scheme boundary. There are two PROW which run west to east across the site (AE639 and AE363); AE639 runs across the western parcel of land and AE363 runs across the eastern parcel of land. Two PROW connect to AE639 (AE337A, and AE338) and run north to south in the western section of the site. A list of PROW within and surrounding the site is detailed in Section 3.9. The closest site designated for nature conservation is Ashford Green Corridors Local Nature Reserve (LNR) 50m west of the site. Hatch Park Site of Special Scientific Interest (SSSI) is 550m north-east. All are shown in the Environmental Constraints Plan in Appendix B.

The site is located within National Character Area (NCA) 120 (Wealden Greensand) and NCA 121 (Low Weald). These areas are rich in biodiversity, with woodland and farmland present across the landscape. Low Weald comprises an intricate mix of woodlands, much of it ancient, including extensive broadleaved oak over hazel and hornbeam coppice, shaws, small field copses and tree groups, and lines of riparian trees along watercourses. Veteran trees are a feature of hedgerows and in fields. In the east of Kent, the Wealden Greensand has a gentler and more open aspect than in the wooded west. This part of the area is also more marked by development, with the presence of major towns and communication corridors including the M26, M25 and M20 motorways and railway lines including the HS1 line.

The western parcel of the site is subject to Outline Planning Application for the Stour Park Development, which was submitted in 2014 (reference: 14/00906/AS). The Stour Park Development was intended as a mixed-use scheme, it is described as follows in the planning application:

'Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq. m ... together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping'.

The Stour Park Development planning permission was approved in 2018 (in line with amended details submitted in 2018). In July 2019, a reserved matters application (19/00579/AS) was granted for the development Phase 1A of the Stour Park Development, relating to the formation of the internal estate roads, the landscaping scheme and its sustainable drainage system.

1.3.2 Proposed Development

Table 1.5 below sets out the physical works associated with the construction works.

Table 1.5: Summary of Construction Phases and Works

Stage	Works	Description of Works	Document / Drawing reference
January 2021	Topsoil and Subsoil Stripping	Topsoil and subsoil stripping of western parcel of land and temporary stockpiling on the eastern parcel of land. Stockpiled material reached a maximum of approximately 175,000m^3. Following completion of bunding, six drainage attenuation ponds and adjacent landscaped areas, the remaining quantity of stockpiled material is estimated to be 97,500m^3 being temporarily stockpiled at the eastern land. The height of stockpiled material has been graded to a maximum 1:3 slope and height of 2m. The remaining stockpile material would be used for landscaping and biodiversity purposes in the eastern plot and for reinstatement of the viewing corridor, subject to further assessment and consent. The stockpiled material will be removed no later than 31 July 2022.	Stockpile Location Drawing 419491-MMD-01-MO-DR-C-0142 Stockpile Cross Section Details 419419 MMD-00-MO-SK-C-0028

Stage	Works	Description of Works	Document / Drawing reference
	Temporary Access	Two temporary access points were required during the construction phase, entrance off Church Road and temporary entrance off A2070. A PROW diversion was needed for the footpath which runs through the middle of the site (AE639) and also for the footpath that extends to the eastern parcel of land (AE363).	
	Vegetation and ecological works	Vegetation clearance and associated ecological mitigation works defined within this report and outlined in the Framework Ecological Management Plan.	Vegetation Clearance Drawing 419419-MMD-01-MO-DR-C-0201 Framework Ecological Management Plan 419419-MMD-XX-SV-RP-BD-0002
	Archaeological investigation	Archaeological investigations across the site as defined within this report and outlined in the Written Scheme of Investigation Technical Note.	Written Scheme of Investigation Technical Note 419419-MMD-XX-SV-RP-HE-0001
	Permanent Access	An access and egress road was created on the northern end of the site off the A2070 and on the western side of the site off Church Road. HGVs enter and exit through the dedicated entrance on the A2070. This entrance is a new signalised junction, constructed specifically for the use of the site. Staff vehicles enter the site through a dedicated access on the western side of the site (Church Road access). The temporary access off the A2070 would be retained as a permanent emergency access.	Permanent Access General Arrangement Drawing 419419-MMD-01-MO-DR-C-0110-A1
	Drainage	Sustainable Drainage System (SuDS) ponds have been constructed, one within the north-eastern corner of the site, two within the north-western portion of the site, and three along the southern boundary.	The location of the SuDS ponds is shown in General Arrangement Drawing January 2021 419419-MMD-01-MO-DR-C-0181 P02
	Development Plot Areas	Hardstanding has been constructed for access, parking areas and entry lanes, as well as internal road layouts. Staff parking has been constructed in the western portion of the site adjacent to the Church Road access, providing 357 spaces. The parking areas for both HGVs and staff parking have been created through the painting of white lines. Works involved the levelling of the ground and works associated with the development plot areas. The roads are paved, and the parking is comprised of gravel with a cellular plastic reinforcement (grasscrete).	General Arrangement Drawing January 2021 419419-MMD-01-MO-DR-C-0181 P02 Ground Levelling Plans 419419-MMD-01-MO-M3-C-0007
	Lighting/ Fencing	Lighting columns are installed on the site, generally at 12m height in the lorry parking areas, 10m height along peripheral roads, and 8m height within the staff parking areas. Fencing installed surrounding the site comprises palisade permanent fencing at a height of 2.1m. Acoustic fencing / noise barriers was installed, to the north of the site (5m in height), the south of the site (a 2m bund with a 3m barrier on top and a 5m barrier where there are no bunds), south-west corner (2m bund plus 3m barrier and a 5m barrier where there are no bunds) and a 4.5m barrier along the access road to the staff car park off Church Road. Closed circuit television (CCTV) is located on-site at the entry lanes area and the staff parking area, at 8m high for all CCTV cameras not facing the entry lanes.	Lighting Details are shown on Plan 419419-MMD-01-MO-DR-E-1361 Fencing and Noise Barriers are shown on Drawing 419419-MMD-01-MO-DR-C-0301-A1
	Buildings	The following buildings have been constructed • HMRC Examination Buildings x 5 • HMRC Inspection Building Offices x 4	See General Arrangement Drawing January 2021 419419-MMD-01-MO-DR-C-0181

Stage	Works	Description of Works	Document / Drawing reference
		• HMRC Locker Room building x 2 • HMRC Marshals Building x 4 • HMRC Driver Welfare Building x 4 • HMRC Office Buildings x 4 • DfT Office Building x 1 • Control Building x 1 • Site Security Building x 1	
	Suspension of parking areas to the north and south of the Site	Prior to July 2021, the northern and southern plot areas were suspended, with the removal of all built infrastructure (excluding lighting columns) within these areas. The hardstanding and drainage within these areas have remained. This involves the overall reduction of HGV parking capacity from 1272 to 651 spaces and capping staff car parking to 357 spaces.	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07
	Viewing Corridor	Removal of all parking infrastructure, including hardstanding and lighting, within the viewing corridor, implementation of soft landscaping within this corridor to be completed Spring 2022.	See Environmental Masterplan January 2022 419491-MMD-01-MO-DR-L-3031 P08
	Landscape Works	Implementation of landscaping has been undertaken throughout construction and has extended into the first year of operation to ensure the mitigation is in place during operation and for the 5-year operational period. Further environmental enhancements have been proposed for implementation following the 5-year period, which are outlined further in Planning Report (document ref: 419419-MMD-XX-SV-RP-T-0001 – P09)	See Environmental Masterplan January 2022 419491-MMD-01-MO-DR-L-3031 P08
January 2022	Buildings	Retention of the following buildings: • HMRC Examination Buildings x 5 • HMRC Inspection Building Offices x 4 • HMRC Locker Room building x 1 • HMRC Marshals Building x 2 • HMRC Driver Welfare Building x 2 • 1No HMRC Staff Welfare Tent • HMRC Office Buildings x 2 • DfT Office Building x 1 • Control Building x 1 • Site Security Building x 1 Construction of the following: • DEFRA BCP Produce Building x 1 • DEFRA BCP Produce Building Office x 1 • DEFRA BCP Plant 1 Buildings x 1 • DEFRA BCP Plant 2 Buildings x 1 • DEFRA BCP Plant 1 Office Buildings x 1 • DEFRA BCP Plant 2 Office Buildings x 1 • DEFRA BCP Plant 3 Buildings x 1 • Large Animals Building x 1 • Combined Animals Office Building x 1 Covering a development plot area of approx.: 34,500m^2 (HMRC – 10,762m^2; DfT/BEIS – 1,106m^2; DEFRA – 22,050m^2)	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07

Stage	Works	Description of Works	Document / Drawing reference
	Suspension of parking areas to the north and south of the Site	Prior to July 2021, the northern and southern plot areas were suspended, with the removal of all built infrastructure (excluding lighting columns) within these areas. The hardstanding and drainage within these areas have remained. The suspended plots may be required in emergency scenarios. Further details are set out in section the Planning Report (document ref: 419419-MMD-XX-SV-RP-T-0001-P09).	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07
	Lighting	Supplementary mitigations, over and above the initial design recommendations (based on 24-hour operation and an acceptance of lighting visual impact) have been implemented on the site from July 2021. These have included: • Baffles on lanterns in close proximity to residents adjacent to the site, primarily to the south of the site; and, • Where possible, permanent lighting lanterns aligned to ensure they are fully horizontal and not tilted. At the time of writing further measures to mitigate lighting were continuing to be explored, including a lighting control system (known as a Central Management System or CMS) in order to allow dimming and switching off of the lighting in areas where operational activities are reduced, as well as additional baffles to mitigate glare for local residents.	
	Covid-19 testing	Covid testing directly linked to the operation of the Sevington facility, which is being carried out within the swim lanes, with associated infrastructure including toilet blocks and welfare tents. Covid-19 testing operations (lateral flow testing and certification) are being carried out on site for hauliers heading to and from Port of Dover and Eurotunnel. These operations are concentrated within the swim lanes, with staff accommodation being contained within the DfT building. There are some temporary structures and welfare contained with the swim lanes: 2 toilets blocks (each consisting of five cubicles). These would be removed once Covid-19 testing is no longer a requirement on site. Communications to hauliers emphasises that they should obtain a Covid-19 test before entering Kent; and there is no Government advertising for testing at SIBF as it is considered as an ancillary service for IBF users. However, some testing is still carried out on non-IBF HGV's (approx. 25-30% of the total Covid-19 testing numbers are non-IBF HGV's).	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07
	Provision of Refrigerated trailers	APHA and the Port Health Authority require up to 24 refrigerated semi-trailers for storage of detained goods and the need to allow for segregation of held consignments. When storing detained goods, the units would be parked at one of the electrical hook-up points to ensure the goods are kept at the correct temperature. The expected location of the trailers is shown on General Arrangement Plan (drawing ref: 419419-MMD-01-MO-DR-C-0182 – P07). These parking bays would be provided with electrical hook-ups. It is envisaged that the trailers would be standard 16m long HGV box trailers. A tug would be used to move these trailers to and from the BCP loading bays for any loading/unloading operations. Each trailer would be approximately 13.95m (L) x 2.60m (W) x 4.170m (H). For the 24 trailers, this would cover a plan area of approximately 870m^2. The trailers would be single storey and would not be stacked on top of each other.	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07

Stage	Works	Description of Works	Document / Drawing reference
	Reconfiguration of HMRC Buildings	Originally prior to detailed design, the 5No HMRC inspection sheds were shown as being contiguous. However, each inspection shed requires external ramp access and therefore collectively, they occupy a larger proportion of the plot. As a consequence, and in order to maintain the original overall HMRC plot dimensions, it was necessary to reconfigure the layout of the various modular buildings (HMRC offices, Marshall buildings and driver welfare). The overall height and plot area for the HMRC buildings have not changed since the original submission. The reconfiguration of the buildings is shown on the updated General Arrangement January 2022 Plan (reference 419419-MMD-01-MO-DR-C-0182 P07).	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07
	Construction Compound	A construction compound on the eastern parcel of land contains construction materials and single level storage containers only. Covering an approximate area of 10,900m^2. This compound will be removed no later than 31 March 2022. A construction compound for completion of the BCP, located to the south of the BCP. This construction compound will be removed following formal commencement of the BCP operation, which commences operation from 1 July 2022.	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07
	HMRC Containers	There is the need for a number of standard storage containers (perhaps five or more), which would have the following dimensions: 6.06m long, 2.44m wide and 2.59m high, covering an overall area of approximately 90m^2. The containers would be located in the HMRC development plot area and are shown on the General Arrangement January 2022 Plan (reference 419419-MMD-01-MO-DR-C-0182 P07). The containers would be used to store equipment and consumables to be used on site. The containers would be single storey and would not be stacked on top of each other.	See General Arrangement Drawing January 2022 419419-MMD-01-MO-DR-C-0182 P07

1.3.2.1 Structure Design Details

Examination buildings and Defra BCP

The design for the HMRC Examination Buildings is provided within the drawings produced by ESG/Amey shown within Appendix C1. The external facades of the buildings would be in the form of coated steel insulated panels (Kingspan KS100RW) on the walls and roofs, as shown in the Kingspan Data Sheet within Appendix C1. The external wall and roof cladding would be painted Goosewing Grey with the modular decking system being Blue, as detailed on drawing A2263-ESG-00-XX-DD-Z-0001 in Appendix C1.

Drawings showing the Defra BCP buildings are provided in Appendix C2.

Modular buildings

The modular buildings include the HMRC Inspection Buildings, HMRC Marshall Buildings, HMRC Welfare buildings and the HMRC Accommodation Buildings and the DfT Office Building. The design for these buildings is detailed on the drawings produce by MAR Construction and the indicative image in Appendix C3. The external facades of the buildings would be in the form of coated steel insulated panels (Kingspan KS100RW) on the walls and roofs. The main panels would be painted Pearl White with the trims painted Anthracite Grey.

Control building

The control building would be constructed to the design details provided by Concept Accommodation and an indicative image in Appendix C4. The external facades of the building would be steel panels finished in either RAL5010 (blue), RAL7035 (grey) or RAL9010 (white).

Noise barriers

The noise barriers constructed for the site would be supplied by Hales Sawmills Limited. The barriers consist of steel posts, timber posts, timber rail and timber boards. The specification is shown in Appendix C5.

Landscape bunds

The landscape bunds would be constructed to the height and slope profiles detailed on the drawings (419419-MMD-01-MO-DR-C-0603 to 419419-MMD-01-MO-DR-C-0605). The landscape bunds would then be planted on to provide the required aesthetic. The planting is detailed within the Environmental Masterplan (419491-MMD-01-MO-DR-L-3030) and the Detailed Planting Plans (419419-MMD-01-MO-DR-L-3034 to 419419-MMD-01-MO-DR-L-3042).

1.4 General Site Management

The core site hours are 07:00 to 20:00 Monday to Friday and 07:00 to 17:00 on Saturdays. However, agreement for Sunday working and 24-hour working from the 30 November 2020 has been approved by the local authority. Any 24-hour working or Sunday and Bank Holiday working would be subject to a Section 61 agreement with the Local Authority.

All noisy operations would be completed between 08:00 to 18:00 on weekdays, and 08:00 to 13:00 on Saturdays, switching off noise-emitting equipment when not in use and the use of temporary noise barriers where possible.

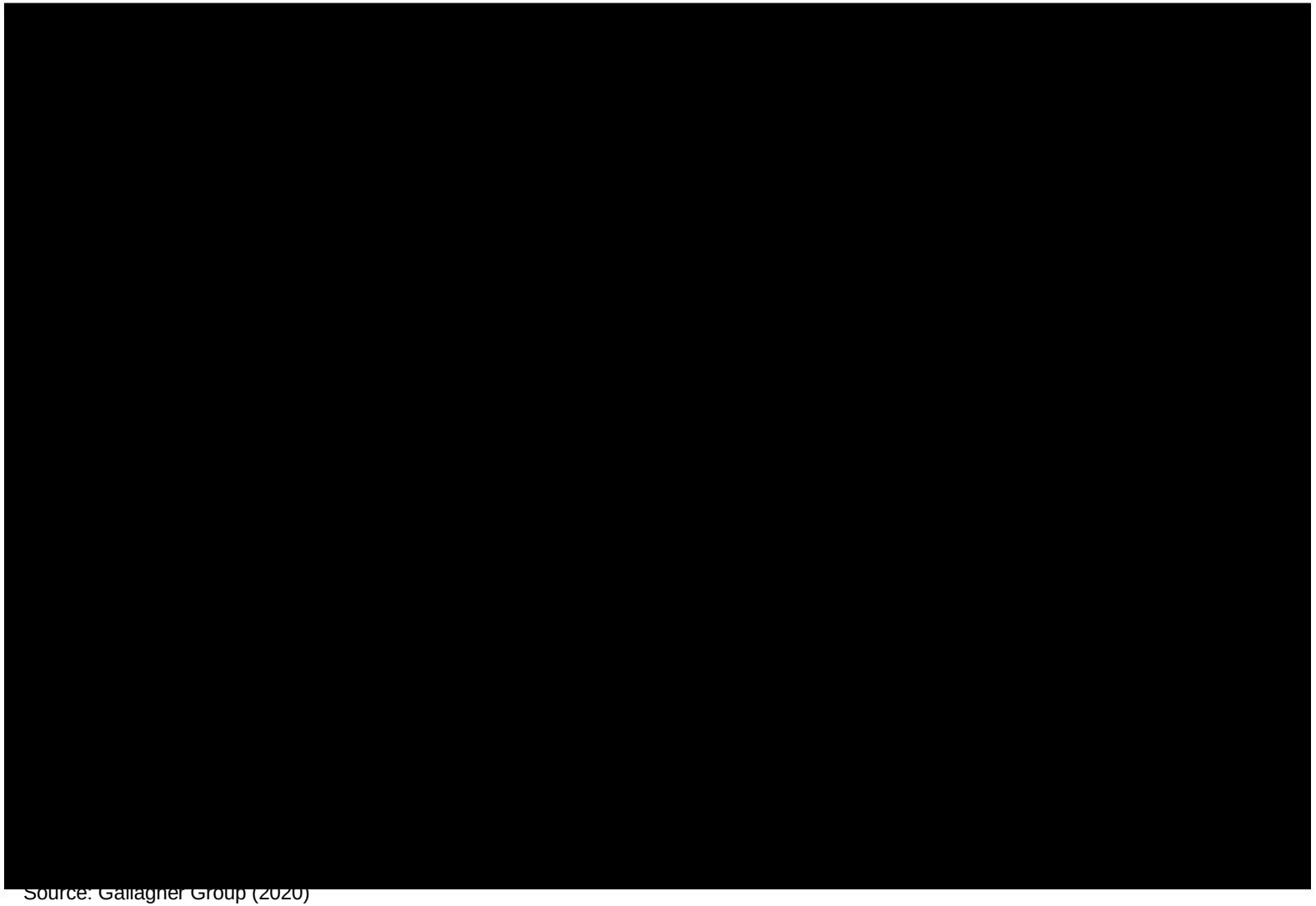
1.5 Site Facilities

The below figures show the site layout during initial construction (Figure 1.2), including access routes, site welfare facilities, site parking and compound areas (Figure 1.3). This compound was required for staff welfare facilities, single-storey office buildings and storage of construction materials. At the time of writing this compound had been removed and the land used for staff car parking only.

Figure 1.4 and Figure 1.5 below show the location of the BCP Compound and Eastern Compound respectively.

The BCP Compound is required to support the completion of the construction and mobilisation works for the BCP facility, which will commence operation from 1 July 2022. This compound provides welfare facilities for construction staff, and for the temporary storage of construction equipment and will be removed following formal commencement of the BCP operation.

The Eastern Compound will be removed by 31 March 2022 at the latest. This compound is required to provide temporary storage of construction materials and single level storage containers only.



Source: Gallagher Group (2020)

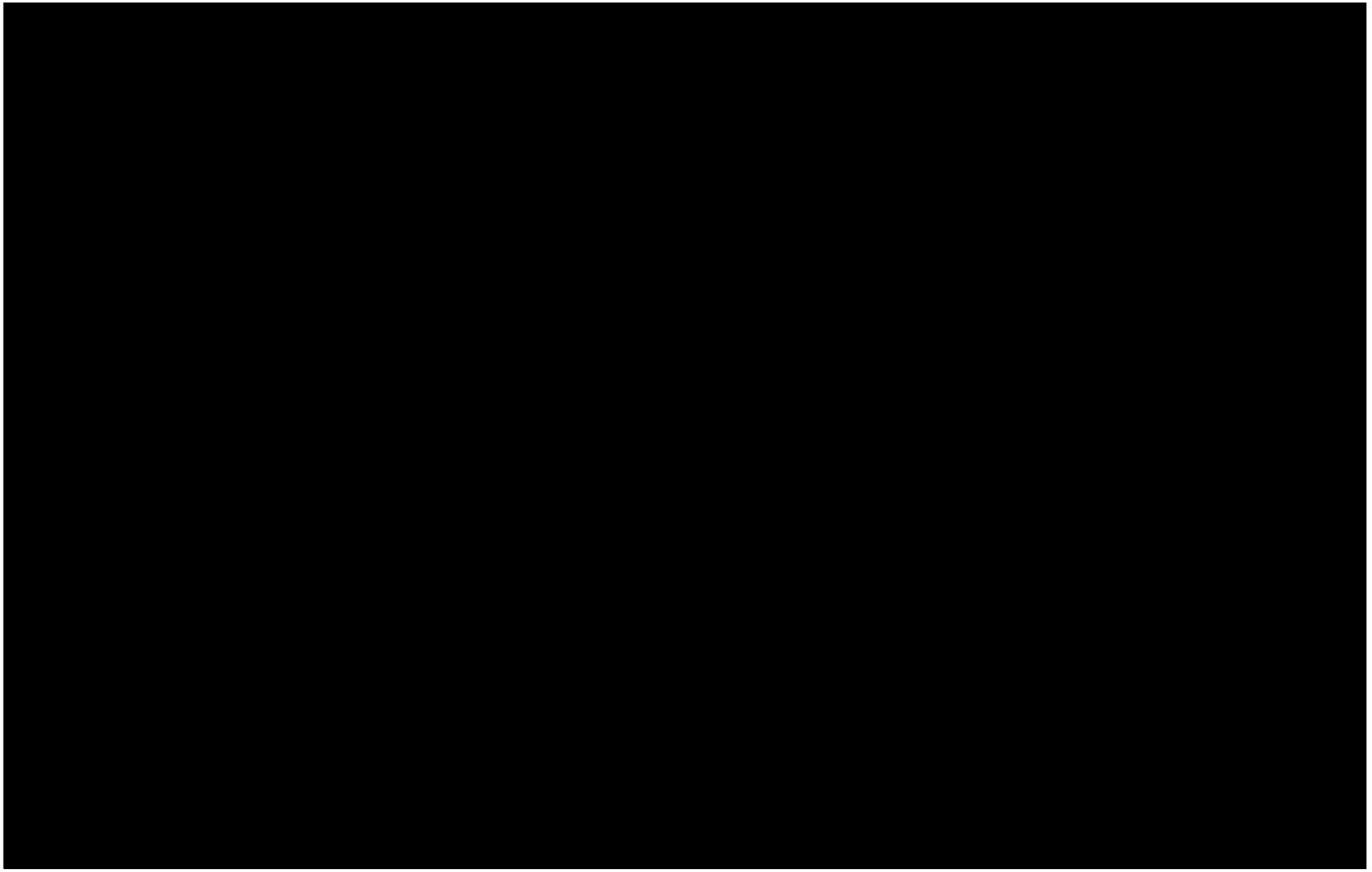
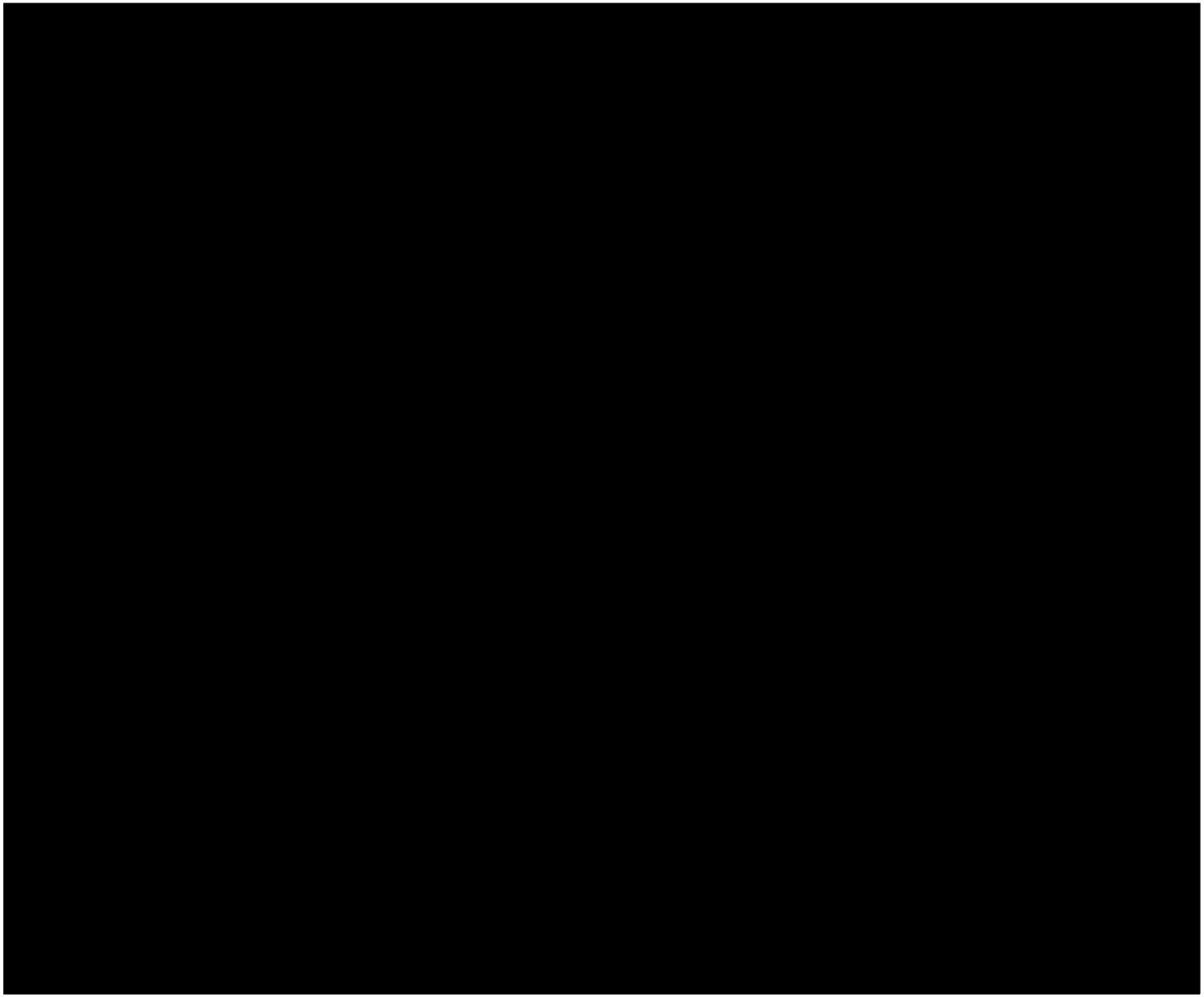


Figure 1.4: BCP Compound Layout (indicated in green)

Sour



1.6 Plan Review

This plan has been developed based on baseline information considered relevant and specific for the site's intended operations as envisaged for construction from 1 January 2021. Notwithstanding this, all elements of the CMP need to be exercised by the Principal Contractors and its effectiveness monitored throughout the whole duration of construction on-site. Regular amendments and additional information would therefore need to be included in the plan following construction observed data. It is therefore the sole responsibility of the Principal Contractors to test and maintain the CMP aligned to the specific construction needs of the site. A copy of the CMP will be kept on site at all times.

As part of this plan's process, it would be reviewed periodically and following the result of an incident. All significant incidents would result in a debrief of all staff involved to understand the lessons learnt and with a view to the Principal Contractors amending this plan.

The site operators will publish the non-technical summary of the CMP as outlined in Appendix A.

2 Environmental Management System

2.1 Introduction

This section describes the procedures and processes that form the Environmental Management System (EMS) which would monitor the environmental performance of the construction phase of the scheme.

2.2 Environmental Culture and Policies

All project personnel would adopt and comply with the Health, Safety and Environmental and Quality Policy Statements (Appendix D). All sub-contractors would be required to work within the requirements of this CMP and the relevant policies. Copies of the policies are displayed on office notice boards and would be briefed to all staff as part of their induction.

2.3 Legislation, Regulation and Other Requirements

All works shall be carried out in accordance with the relevant environmental legislation, other regulatory requirements and best practice.

The Principal Contractors would develop Plans and Procedures, an Aspects and Impacts Registers, Risk Assessments and Method Statements to manage environmental hazards, risk and commitments. These documents would be updated as necessary and submitted for review throughout the lifetime of the Project.

The Principal Contractor's Health, Safety and Environmental and Quality Policy Statements are attached in Appendix D.

2.4 Roles and Responsibilities

The success of the CMP is dependent upon the extent to which it can be upheld and enforced. The Principal Contractors would define and document the responsibility, authority and inter-relationships of key personnel who manage, perform, and verify work affecting the environment.

All project personnel have full environmental responsibility and would be actively encouraged to demonstrate environmental responsibility in respect to activities undertaken.

Gallagher Group are responsible for the wider site construction activities. ESG/Amey are responsible for the construction of the Defra BCP, shown in Figure 1.4.

The management team from Gallagher Group who would be on-site for the duration of the works are, one Contracts Manager, one Project Manager, two Senior Site Managers, two Site Managers, seven Site Engineers, one Gateman and one out of hours security guard.

The management team from ESG/Amey would consist of a minimum of one Project Manager on site Monday-Friday overseen by visiting Project Director and Senior Project Manager from Amey.

The Principal Contractors would nominate an Environmental Advisor as the individual having responsibility for environmental matters. The Environmental Advisor is responsible to ensure all environmental and sustainability management requirements set out in this document. Sub-contractors engaged on the project would also be required to adhere to all the environmental and sustainability management requirements of the project.

The Environmental Advisor would co-ordinate and implement the EMS and would liaise closely with the whole team in respect of all environmental aspects associated with the works.

To ensure that the site is managed correctly, weekly meetings and inspections would be carried out. Organograms for the Principal Contractor's personnel are shown in Appendix E.

2.5 Consents and Licences

The Principal Contractors would gather all relevant information to make applications to obtain Consents, Licences and Permits in the necessary timescales in line with Project Programme and key dates. Copies of all applications and consents would be issued to the client and maintained on a register.

No works requiring consents / licenses / method statements would be undertaken until the appropriate consent / license / method statement is in place from the regulator. Copies would be held in the Project Files. The conditions attached to any consent, licence or procedure would be briefed out to relevant staff and records held in the Environmental files. Copies of any consents / licences obtained throughout the construction phase shall be made available to the Client and incorporated into the Data Books at project handover.

The scheme requires the following consents which have been obtained by the identified party:

Table 2.1: Scheme consents and licences (Construction Only)

Consent	Regulator	Obtained by
Natural England Development License for Dormice	Natural England	Mott MacDonald
Natural England Development License for Badger	Natural England	Mott MacDonald

2.6 Emergency and Incident Response

All environment incidents, accidents and near misses would be reported in accordance with statutory requirements. All incidents, accidents and near misses would be investigated and communicated to the client. The Principal Contractors would maintain an Environmental Incident Register, to record all environmental incidents, irrespective of size and nature. The contents of this register would be discussed under the standing agenda item 'Environmental Issues' at weekly project meetings.

2.7 Training and Awareness

The Principal Contractors would ensure all employees on-site are appropriately qualified and suitably experienced to undertake the scope of works.

All site personnel would undergo a site induction (full or visitor). As part of the induction, Environmental elements would be covered. A record would be kept and maintained of all attendees.

The Principal Contractors would be responsible for identifying training needs of their employees.

In addition to a site induction, training would include daily site briefings and toolbox talks to ensure all employees on-site are aware of the risks on a daily basis on health, safety, security, community relations and environmental topics.

2.8 Construction Method Statements

Method statements would be produced stating how construction activities would be carried out to meet the requirements of the CMP. Method statements would be reviewed by the Environmental Manager prior to works commencing and are included in this CMP.

3 Public and Stakeholder Communication

3.1 Introduction

This section addresses neighbour and community liaison during the works. The Principal Contractors are responsible for ensuring compliance with the procedure. In addition, all staff are responsible for adhering to its requirements. Engagement with numerous stakeholders has been completed throughout the design process to ensure that negative impacts would be mitigated throughout construction. Stakeholders include Natural England, Environment Agency and Local Councils, details of which are covered within the *Sevington Inland Border Facility Stakeholder Engagement Report* (document reference: 419419-MMD-XX-SV-RP-Z-0001).

3.2 Liaison and Communication Protocols

All identified neighbours and community stakeholders surrounding the site were engaged with during the planning process regarding the inland border facility. Information was shared with all landowners / occupiers located within the below consultation radius via letter, with further details and contact information available via the Inland Border Facilities' website[4].

Figure 3.1: Blue Line Engagement Boundary

The importance of community engagement throughout the construction process is recognised and would continue throughout construction.

[4] Department for Transport (2021) Ashford – Sevington Inland Border Facility [online] available at: https://inlandborderfacilities.uk/?page_id=61 (last accessed November 2021).

3.3 Complaint Handling Procedure

The Principal Contractors would consider ways to engage the community with the proposal and also consider mitigation methods. It is advised that the operators engage with the local authority to understand their opinion on the site. Opening and maintaining a dialogue with the local authority could give the operators insight into what is expected of them in relation to construction works, particularly noise, and could also help the local authority understand the need for the project and the restrictions of what is achievable. The local authority would likely have their own criteria on the difference between current background noise levels and the noise levels created using the site which is important for the operators to understand and aim for.

Should a complaint be received a nominated member of the Stakeholder Engagement Team would be responsible for managing it with a target of resolving any issues within 48-hours of a complaint being received.

3.4 Documentation

Relevant documentation regarding the CMP would be maintained by the Principal Contractors and can be shared if requested.

4 Environmental Management Requirements

4.1 Introduction

The following section details all the environmental management requirements that would be implemented throughout the construction phase of the scheme.

4.2 Environmental Constraints

Key environmental constraints within the vicinity of the site include the grade I listed Church of St Marys adjacent to the west of the site, multiple Grade II listed buildings along Church Road, multiple residential properties along Church Road and Kingsford Street, several PROW across the site, Ashford Green Corridors LNR to the west and the Aylesford Stream to the north. These are shown on the Environmental Constraints Plan in Appendix B.

4.3 Air Quality and Emissions

There are approximately 40 residential properties and farms within 200m of the scheme. The closest residential properties are located along Church Road adjacent to the south of the scheme.

No Air Quality Management Areas have been declared by Ashford Borough Council.

Please refer to the Air Quality Impact Assessment (419419-MMD-XX-MO-RP-AQ-0001 P03) for the scheme for further detail.

The principal sources of emissions during construction are:

- Construction traffic.
- Dust creation from construction activities and temporary stockpiling.

Procedure

The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

Works would be carried out in accordance with Best Practicable Means, as described in Section 79 (9) of the Environmental Protection Act 1990, to reduce the creation of dust on-site. This would include:

- Minimise height of stockpiles and profile to minimise wind-blown dust emissions and risk of pile collapse.
- Locate stockpiles out of the wind and seed the stockpiles to minimise the potential for dust generation.
- Ensure that all vehicles with open loads of potential dusty materials are securely sheeted or enclosed.
- Enforce a maximum speed limit of 15mph on surfaced roads and a 10mph speed limit on unsurfaced haul roads and work areas, to prevent the generation of dust by fast moving vehicles.
- Damp down surfaces in dry conditions.

- All vehicle engines and plant motors shall be switched off when not in use.
- The use of mains electrical power, hybrid generator systems and battery powered equipment where reasonably practical.
- All plant on-site would be in good operating condition. Exhaust emission from all plant would be reduced as much as possible by effective and regular maintenance.
- Low sulphur diesel fuel would be used in all plant (non-road mobile machinery).
- The Principal Contractors would maintain a register of all plant on-site to record inspection and set up a system of regular inspection of all plant.
- Vehicle and construction plant exhausts would be directed away from the ground and position them at a height to facilitate appropriate dispersal of exhaust emissions.
- The placement of stone / soils / concrete by plant or equipment would be under control and as low as reasonably practicable to prevent undue creation of dust.
- Dust suppression systems to be in place where there is a foreseeable risk to air quality in accordance with Class Approval 6 Dust Suppression.
- Vehicles transporting materials within or outside the construction site would not be overloaded.
- Check site accesses and local roads daily for mud and arrange for it to be cleaned immediately should it be required.
- No open fires to be permitted on-site and measures to minimise fire risk are implemented, where relevant.
- Movement of construction traffic around site would be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the project.

4.4 Archaeology and Built Heritage

There are no designated heritage assets within the site itself. However, there is one grade I listed building, Church of St Mary (NHLE: 123390, MM002) located approximately 30m west of the site. It has a significant visual relationship with the Church of St John the Baptist (NHLE: 1276693, MM003) in Mersham, which is also Grade I listed. Visibility between the spires of the two churches is maintained on the route of a public footpath. This contributes to the value of both churches as it maintains the historic relationship between the contemporary churches of neighbouring parishes.

Along the south / south-western edge of the site are seven Grade II listed buildings clustered along Church Road, associated with the historic village of Sevington. In addition, there is a collection of Grade II listed buildings along Kingsford Street situated north of the site.

There are various non-designated heritage assets that have been recorded within the site, including the Royal Observer Corps underground monitoring post (HER: TR04SW126, MM110). The site has high archaeological potential for remains of multiple periods.

Please refer to the *Cultural Heritage Assessment (Document ref: 419419-MMD-XX-SV-RP-YE-0004 P06)* for further details of the heritage assets within the study area and archaeological potential of the site.

The principal sources of potential effects during construction are:

- Movement of plant.
- Appearance of work sites.
- Construction noise.

- Excavation, Plant Movement and Stockpiling which could impact archaeological remains.

Procedure

The following measures to reduce impacts on the historic environment and heritage assets would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme. Please refer to Appendix F for the full Written Scheme of Investigation:

- The heritage risk would be explained to all employees and sub-contractors within the site induction and through Toolbox Talks.
- Archaeological investigation by suitably qualified archaeologists is being undertaken as part of recommendations for the previously consented scheme in line with the requirements set out in the Written Scheme of Investigation Technical Covering Note (Appendix F) and need to progress in line with this:
  - Strip, map and sample of areas west of Highfield Lane which were identified by the previous development application.
  - Trial trenching of the area south of Highfield Lane.
- Archaeological investigation by suitably qualified archaeologists will be undertaken within the eastern field, following consultation with KCC and production of an agreed WSI.
- No works are to commence on the eastern land until an archaeological approach is agreed.
- Implementation of the design measures and landscaping planting early during construction included in the Environmental Masterplan, including the formation of visual bunds.
- Prior to stockpiling on the eastern land, the level of the land should be marked through the retention of the existing crop stubble. The existing ground level must not be broken during the removal of the stockpiles by 31 July 2022 at the latest.
- Avoidance of any movement of stockpiles when the ground is very wet. It is recommended that works to move stockpiles is not undertaken until 1 April 2022 at the earliest, to avoid deep rutting and potential disturbance of unknown archaeology.

4.5 Carbon

The UK construction industry is the largest consumer of natural resources with an average of over 400 million tonnes of material consumed every year. This accounts for approximately 10% of the UK's annual carbon emissions[5]. Therefore, there is significant scope to impact upon carbon emissions by employing carbon reduction principles. The carbon assessment estimated emissions of 33,093 tonnes of carbon dioxide equivalent for the construction of the scheme.

The principal sources of carbon during construction are:

- The embodied carbon of the products and materials.
- Emissions from the plant used during construction.
- Transport of products and materials to site.

Procedure

[5] Institute of Civil Engineers (ICE) (2014): Energy Briefing Sheet: Embodied Energy and Carbon [online] available at: https://www.ice.org.uk/ICEDevelopmentWebPortal/media/Documents/Disciplines%20and%20Resources/Briefing%20Sheet/Embodied_Energy_and_Carbon.pdf

The following carbon reduction principles as detailed within Section 3 of the Carbon Assessment and Reduction Report (Appendix G) would be considered by the Principal Contractors and all sub-contractors for the duration of construction of the scheme:

- Transportation of materials to site would prioritise low-carbon modes where possible.
- Where possible, low-carbon construction materials and products would be preferred.
- Where possible low-carbon construction plant and equipment would be used.
- Provision would be made to enable waste to be effectively segregated during construction, enabling materials to be effectively managed using the waste hierarchy, prioritising re-used and recycling over disposal.
- Circular economy principles, such as Modern Methods of Construction, would be implemented, where possible.

4.6 Construction Materials, Sourcing, Management and Storage

Material resources would be required for the construction of the scheme, including but not limited to, aggregates and minerals from primary, secondary and recycled sources and manufactured construction products. The study area is covered by a mineral safeguarding area (MSA) for limestone (Hythe Formation – Kentish Ragstone) under the *Kent Minerals and Waste Local Plan 2013-30* (2020)[6].

The principal sources of potential effects on material assets and waste during construction are:

- The depletion of natural resources and waste management infrastructure capacity.

Procedure

Where possible, ensure that the waste hierarchy is followed when dealing with waste on-site: prevention, re-use and preparation for re-use, recycle, recovery, and disposal.

Waste audits would be required to measure the effectiveness of the waste management procedure.

Works would be undertaken in line with the Site Waste Management Plan in Appendix H and the Materials Management Plan in Appendix I for the re-use of site won material within the landscaping bunds.

The following measures would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- All suppliers would be issued specific site routing arrangements in conjunction with the Traffic Management Plan (Appendix J) to enable efficient delivery of all materials to ensure all materials are handled and located in the correct storage areas to minimise the risk of damage as far as is practically possible.
- Site Plans would be issued and displayed indicating all material storage areas. These arrangements would be regularly monitored, reviewed and all changes updated and communicated to all connected and associated parties.
- Site Plans would be displayed at appropriate locations – Site Canteen, Site Entrance and the Gateman's Hut, indicating the Site Waste Management Storage areas. Consideration would be given to ensure that they are positioned appropriately in clear view, not obstructed by the works or material storage. These areas would regularly be reviewed to ensure that they are appropriately positioned and re-located where deemed necessary.

[6] Kent County Council (2020) *Kent Minerals and Waste Local Plan 2013-30.* Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf

- Senior Site Manager would be appointed as the “waste champion” overseen by the Building Manager.
- Waste would be separated if appropriate, Wate Acceptance Criteria tested and categorised prior to removal by a licenced contractor appropriate to the waste category.
- Numbers of containers e.g. number of central skips, number of mini skips, wheelie bins or bags at work face to be reviewed daily throughout the project.
- Arrange colour coding, order / develop posters. The site would adhere to the National Colour Coding scheme for waste segregation.
- Ensure waste bins are appropriately sized and placed throughout the area ready for operation.
- Local recovery routes for waste streams, recyclers and waste contractors to be finalised.

The following measures to ensure quality of stockpiled soil is maintained would be implemented by the Principal Contractors and any sub-contractors:

- The stockpile should be managed in line with the Defra *(Department for Environment, Food & Rural Affairs) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*[7].
- The stockpile must be removed by 31 July 2022 at the latest.
- The stockpile should be seeded to maintain quality of soil.

4.7 Ecology

The following sites designated for ecological conservation are located within the relevant study areas of the scheme:

- Hatch Park SSSI is located approximately 550m north-east of the site.
- Ashford Green Corridors LNR is located approximately 50m west of the site.
- Willesborough Lees and Flowergarden Wood Local Wildlife Site (LWS) (AS44) is located approximately 900m north of the site.
- South Willesborough Dyke LWS (AS19) is located approximately 1km south west of the site.

The site consists of arable land, occupying over 75% of the site, hedgerows, ditches, improved grassland, plantation woodland, poor semi-improved grassland, mature scattered trees, scrub, tall ruderal vegetation and hardstanding. The most notable habitats are considered to be the hedgerows. Other habitats of note include the plantation woodland, ditches and the mature scattered trees.

An active outlier badger sett with one entrance was identified towards the north-west of the site during the walkover in May 2020. In 2019, a dormouse survey of the site was undertaken. Dormice evidence was recorded in the small block of broadleaved woodland to the west of the site, within vegetation located to the north of Church Road, and towards the southern extent of the hedgerow along Highfield Lane. The site supports two areas that are considered to be ‘Key Reptiles Sites’ in accordance with Froglife[8] criteria.

The principal sources of potential effects on biological receptors during construction are:

[7] Department for Environment, Food & Rural Affairs (2018) *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*. Available at: https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites

[8] Froglife (1999) *Reptile survey. An introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife Advice Sheet 10.* Froglife: Peterborough.

- The removal of vegetation which is inhabited by protected species.
- Construction noise, lighting and visual disturbance to protected species from the associated personnel, plant and traffic management during the works.

Procedure

To limit disturbance to habitats and protected species, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme. Please refer to Appendix K for the Framework Ecological Management Plan which should be followed throughout the duration of the works:

- Best practice measures would be employed on-site to minimise impacts due to construction noise, dust and water pollution as far as possible in line with section 4.3, 4.11 and 4.15.
- Ensure lighting is managed in accordance with Section 4.10.
- Careful siting of haul routes, materials storage areas, compounds, lighting and generators away from sensitive habitats.
- Night-time working would not be allowed during the months when bats are actively foraging (April to October inclusive) to prevent lighting disturbance to foraging bats.

To reduce habitat loss and degradation, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme. Please refer to Appendix L for the full Arboriculture Report which was revised to be reflective of the on-site conditions following a site visit on 26 November 2020:

- Existing trees and vegetation to be retained (including hedgerows) would be protected during the construction phase with protective fencing.
- Protective barriers must be installed in accordance with BS5837:2012 around all of the trees and groups that are due to be retained, at the distances dictated by the root protection area (RPA) dimensions stated in Table 3.4 of the Stour Park Pre-Development Arboriculture Survey (RT-MME-120243-08) to protect these trees.
- An Arboriculturist must attend site prior to commencement of the works to confirm the final positioning of the protective barrier.
- For the location and alignment of the temporary protective barriers required for the additional trees and groups that have been removed or retained as part of the Sevington IBF works, refer to the *Tree Protection Plans (418703-MMD-XX-SV-VS-YB-0001*-04). For the location and alignment of the temporary protective barriers required for trees and groups that have not changed, refer to the Stour Park West Arboricultural Impact Assessment.
- The area within the protective barriers i.e. tree side, would be a “Construction Exclusion Zone” (CEZ) for the duration of the works.
- All weather notices must be erected on the barrier with words such as: “Tree Protection Area — Keep out”.
- The following prohibitions shall also apply within the area enclosed by the temporary protective barriers:
  - No mechanical digging or scraping.
  - No storage of plant, equipment or materials.
  - No vehicular or plant access.
  - No fire lighting within 10m of tree canopies.
  - No handling, discharge or spillage of any chemical substance, including cement washings and vehicle washings within 10m.
  - No action likely to cause localised waterlogging.

- No alteration of ground levels.
- No construction of hard surfaces.
- No attachment of boards, hoarding, cables or notices or fencing to trees.
- No storage of excavated materials.

- Special care is to be taken on sloping ground where spillages could run towards the trees. A collecting channel dug along the outer line of the protective fencing would be one method of avoiding such damage.
- If excavators are to be used during construction, at no time is the excavating arm to encroach over the position of the tree protection barriers.
- All construction compounds, storage facilities and deliveries must aim to make use of existing hard surfaces to avoid unnecessary compaction within RPAs. If compounds require siting within RPAs, appropriate footings or ground cover must be used to avoid root damage or compaction of the soil and siting must ensure that any damage to aerial parts of retained trees is avoided.

To protect reptile populations on-site, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme:

- A Reptile Mitigation Strategy (see Appendix K for further details) would be implemented in order to protect the reptile populations during construction. The following methodologies and techniques would be used prior to construction commencing:
  - Receptor site review.
  - Habitat manipulation.
  - Trapping and translocation.
  - Supervised soil strip.
  - Sensitive timing of works.
  - Worker awareness and sympathetic working practice.

The following measure to protect badger populations would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Closure of badger sett under a Natural England Licence.

The following measure to protect dormice populations would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Removal of dormouse habitat under a Natural England licence and ensure sensitive method of vegetation clearance, in accordance with best practice.

The following measures to prevent disturbance to breeding and wintering birds would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Vegetation clearance would be programmed to avoid the nesting bird season (March to August inclusive) if possible.
- Where this is not possible a breeding bird survey would be carried out by an ecologist 48-hours in advance of proposed clearance works to check for bird nesting activity.
- If active nests are found a buffer of vegetation shall be retained until all young have fledged and the nest is deemed inactive by an ecologist.

The following measures to provide new habitats on-site would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Implementation of the design measures and landscaping planting included in the Environmental Masterplan including the erection of ten bird, ten bat and six dormouse boxes.

No evidence of invasive species has been found on-site during ecological surveys and all planting would be of native species. As such, no specific measures have been suggested. However, evidence of invasive species is found during construction, then consultation with the site ecologist would be required.

Full details of the ecological site works and protection of ecological receptors on-site as contained in Appendix K which should be followed throughout the duration of construction.

4.8 Housekeeping

Procedure

To reduce the likelihood of an environmental incident or nuisance occurring, the following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- Treatment of perimeters, cleanliness on-site, provision of staff facilities, and waste management.
- Effective preventative pest and vermin control and prompt treatment of any pest and vermin infestation, including arrangements for disposing of food waste or other attractive material, if an infestation occurs, the contractor would take action to eliminate the infestation and prevent further occurrence.
- Water management measures would be adhered to in line with Section 4.15.
- Measures to minimise noise and air quality emissions would be implemented in line with 4.11 and 4.3.
- Storage of machinery, equipment and temporary building outside flood risk areas where possible.
- Management of staff congregating outside the site prior to commencing or leaving site.
- Security measure would be installed to prevent intrusion into residential properties.
- Maps showing sensitive areas and buffer zones where no pollutants are to be stored or used would be displayed in all welfare facilities.
- Adequate welfare facilities would be provided.
- A construction worker travel plan would be implemented to encourage use of public transport by site staff and control off-site parking.

4.9 Landscape and Visual

A number of visual receptors have been identified within the study area, the majority of receptors are located within 500m of the site, with several high sensitivity residential receptors neighbouring the periphery of the site, and PROW AE639 traversing the site itself from north-west to south-east.

The principal sources of potential effects on visual intrusion and landscape character during construction are:

- Construction activities bringing new features into the landscape that would be at odds with the current agricultural landscape.
- Machinery and materials would be present on-site which has the potential to disturb the landscape character of the area and cause a visual intrusion.

- Lighting disturbance caused by temporary lighting during construction.

Procedure

In order to limit visual intrusion and impacts upon landscape character, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme:

- Prioritise the creation of the landscape bunds early in the construction period to aid screening of lower level activity.
- Seed permanent bunds as priority to 'green up' earthworks.
- Implementation of planting in the first planting season to aid the integration of the scheme with the surrounding landscape, as detailed in the environmental masterplan.
- Keep a well-managed and tidy site, with construction materials delivered on an as and when needed basis to reduce material stockpiles on-site.

The following measures would be implemented during construction of temporary stockpiles by the Principal Contractors and all sub-contractors:

- Kept to a maximum 2m in height.
- Located as far away as possible from properties on Kingsford Street.
- The 'active' side of the stockpile should be restricted to the western edge, adjacent to Highfield Lane which would aid screening of any soil and plant movements.
- Stockpile should be seeded as a priority. The remaining faces of the stockpiles should be left inactive to limit visual intrusion upon neighbouring residential receptors.

4.10 Lighting

During construction, site lighting would be required to enable the safety and security of the construction site, whilst limiting potential impacts from light spill on residential properties and ecological features.

Procedure

The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- Lighting would be at the minimum luminosity necessary and use low-energy-consumption fittings.
- Where necessary, lighting to site boundaries would be provided and illumination would be sufficient to provide a safe route for the passing public.
- Where appropriate, lighting would be activated by motion sensors to prevent unnecessary usage.
- Lighting would comply with the Institute of Lighting Professionals' *Guidance notes for the reduction of obtrusive light*[9] and the provisions of BS 5480, *Code of practice for the design of road lighting,* where applicable.
- Lighting would be designed and positioned so as not to unnecessarily intrude on any adjacent buildings, ecological receptors, structures used by protected species, and other land uses such as residential properties.

[9] Institute of Lighting Professionals (2011) *Guidance notes for the reduction of obtrusive light.*

- Lighting would be directed downwards where possible and away from adjacent receptors to minimise light intrusion for adjacent buildings, ecological receptors, structures used by protected species, and other land uses such as residential properties.
- The positioning and design of temporary lighting to be installed during the construction work would be considered in relation to:
  - Minimum requirements for transport users.
  - Safe operation of the railway and roads.
  - Requirements for least disturbance to local ecology.
  - Energy efficiency, ease of maintenance and disposal of light units (Light-emitting diode (LED) to be considered).
  - Construction site lighting should be directed away from any sensitive receptors.
- Lighting columns powered off the mains would be used as a first priority but if not then either hybrid powered lighting columns or string (generator powered) lights would be used. Security lighting would be as low as reasonable during night-time periods.
- Lighting shall be switched off when not in use (where lighting can be isolated for individual lights / sections, or lighting across the entire site is not required).
- The use of infrared initiated security lighting to minimise night-time lighting shall be explored.

4.11 Noise and Vibration Management

There were 21 representative receptors, including four farms and a place of worship located within the study area. Further information on individual receptors can be found within the Noise Impact Assessment (419419-MMD-XX-MO-RP-YA-0001). Furthermore, there are two Noise Important Areas (NIA) located within the study area:

- One NIA is to the north-west of the site along to A2070 to Junction 10 (ref: r3_ID: 4509) containing approximately 50 properties.
- One is located along a short stretch of the M20 near Junction 10a and contains two properties (r3_id: 4507).

There is the potential for a temporary, adverse effect on nearby residential receptors as a result of noise arising from the construction works associated with the scheme.

Procedure - Noise

The following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- All noisy operations would be completed between 08:00 to 18:00 on weekdays and 08:00 to 13:00 on Saturdays wherever possible.
- Switching off noise-emitting equipment when not in use and the use of temporary noise barriers where appropriate.
- Activities conducted during night-time working (between 23:00-07:00) would not exceed 45 dB as per clause E3.2 from BS5228-1[1].
- Any activities identified that could be undertaken outside of the working hours and limits set out above will require prior agreement with Ashford Borough Council and subject to a Section 1 Agreement.

[1] BS 5228-1:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites.

- Construction works would comply with the recommendations for practical measures to minimise noise and the maximum permissible noise limits set out in BS5228-1[1]. Should construction activities be identified that could exceed these limits, prior agreement would be sought with Ashford Borough Council. In order to inform the establishment of suitable noise limits it is expected that a baseline noise monitoring survey would need to be undertaken at representative receptor locations based on a recognised standard such as BS 7445-1:2003 Description and Measurement of Environmental Noise.
- All equipment and vehicles would be switched off and if applicable ignition key removed when not in use.
- Use of temporary noise barriers where appropriate.
- Noise and vibration would be controlled at source by using the following:
  - Fit equipment with silencers or mufflers.
  - Manage deliveries to prevent queuing of site traffic.
  - Do not leave plant running unnecessarily.
  - Materials to be lowered instead of dropped from height.
  - Use of adjustable or directional audible vehicle-reversing alarms or use of alternative waring systems (for example, white noise alarms).
  - Train and advise members of the constructions team during toolbox talk briefings on quiet working methods.
  - Sensitive placement of plant and equipment with the potential to generate emissions.
  - Enclosure, shielding or provision of filters for plant likely to generate excessive quantities of dust or noise beyond the site boundaries.
  - Adoption of quiet working methods including auger and vibration piling rather than impact piling.
  - Early delivery of noise mitigation identified in the environmental analysis where reasonably practicable and relevant (e.g. acoustic bunds or fencing).
  - Use of less intrusive noise alarms that meet the particular safety requirements of the site, such as broadband reversing warnings, or proximity sensors to reduce the requirement for traditional reversing alarms.
  - Avoidance of the use of loudspeaker or loudhailer devices.
  - Considerate working practices, such as avoiding noisier activities during anti-social hours and pre-notification of particularly noisy or drawn out activities to relevant receptors (including materials delivery).
- Where it has been identified that there would be noise levels above the lower exposure action value of 80 dB(A) $L_{EP,d}$ (daily personal exposure level), operatives would be issued with suitable hearing protection which under company policy they would be required to wear. The works would be noise monitored, and if it is found that the noise levels exceed the upper exposure action value of 85 dB(A) $L_{EP,d}$ an exclusion zone would be established that can only be entered by persons wearing adequate hearing protection.

The following measure to mitigate the effects of stockpiling activity on the eastern side would be implemented by the Principal Contractors and any sub-contractors for the duration of the construction of the scheme:

- Position stockpiled material closest to the residential receptors first to ensure a bund between the works and the receptors is formed.

Procedure - Vibration

Vibration would also be assessed and when a task has been identified that requires the use of a vibrating tool with a vibration frequency of 2.5 m/s^2 or higher, then form GP.1124.F01 Hand Arm Vibration Calculator Permit would be completed. This form identifies:

- Action limit time - this is where the task can be carried out with no further actions required.
- Daily limits - this is the maximum exposure time on that piece of equipment/tool exposure - measured in m/s^2.

When 2.5m/s^2 over an eight-hour day is exceeded, the GP.1124.F01 chart would change from green to amber. At this stage, consideration must be given to control measures such as reducing the tool / equipment vibration frequency, reducing the exposure time, task rotation etc.

Persons operating vibrating / power tools / equipment etc. must not be exposed to any frequency/ time combination which indicates red on the chart.

4.12 Pollution Prevention and Control

Procedure

To reduce the likelihood of an environmental incident or nuisance occurring, particularly with the presence of Stodmarsh Special Protection Area, Special Area of Conservation and Ramsar site downstream of the site, the following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- Activities must be managed in accordance with Construction Industry Research and Information Association (CIRIA) Guidelines and Environment Agency's Protect groundwater and prevent groundwater pollution.
- Stationary plant would be used with secondary containment measures such as plant nappies to retain any leakage of oil or fuel, which would be emptied at regular intervals to prevent overflow.
- Fuel would be stored in dedicated bunded, impervious storage areas away from drains and watercourses.
- Fuel tanks would be stored within a bund capable of holding 110% of their capacity.
- Spillage kits would be stored at key locations on-site as set out in a pollution incident control plan and in particular refuelling areas. Spillage kits would also be kept with mobile bowsers.
- Plant chemical absorbent pads and drip trays would be in use during the refuelling process to catch any drips or spills between bowser and machinery.
- Refuelling operations would only be undertaken by designated refuellers in line with refuelling procedures.
- All staff would be trained to use spill kits efficiently.
- The contractors would consult with the relevant regulatory bodies regarding specific requirements in relation to establishing and operating concrete batching plants on-site. Wash water from any batching plants would not be discharged to the water environment without the approval of the relevant authority.
- The contractors / site operator would keep a record of all spillage incidents and inform the nominated undertaker should any spills occur which could cause land contamination or pollution off-site and provide records to the Environment Agency if required.
- The principal contractors would manage and dispose of foul water and sewage effluents from site facilities, complying with PPG4: Treatment and disposal of sewage where no foul

sewer is available, The Environment Agency's guidance document Groundwater protection: Principles and practice (GP3).

- Containment by temporary foul drainage facilities and disposal off-site by a licensed contractor.
- By preference, connection to the local foul sewer system as agreed with the relevant authorities.
- Where foul sewage is not present, discharge to a watercourse or soakaway is not permitted.
- Any foul drainage discharge to the public sewer would require approval from the statutory water undertaker, Southern Water. If not permitted, provisions need to be adopted to remove the liquid from site for disposal, such as via a tanker.
- Any waste or foul water that is tankered offsite must be taken to a wastewater treatment works outside of the Stour Valley catchment under trade effluent licence.
- Provision of maps showing the locations, together with address and contact details, of local emergency services facilities (e.g. police stations, fire authorities, medical facilities and other relevant authorities).
- Provision of contact details for the relevant authorities, such as the Environment Agency, and the persons responsible on the construction site and within the contractors' organisation for pollution incident response.
- Provision of contacts with a competent spill response company which can be contacted at short notice for an immediate response (where appropriate).
- Ensure staff competence and awareness in implementing plans and using pollution response kit.
- Ensure that site drainage plans and flood risk management plans are available on-site and are kept up to date.
- Ensure that pollution shut-off / penstock valves are used in compounds with formal drainage.
- Any stockpiled materials to be stored within enclosed areas to enable the run-off to be stored and treated where required.
- All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas.
- Extra vigilance shall be required to avoid silt run off and its impact on the drainage system from construction activities. This shall include cut-off ditches for landscape not established, seeding to retain topsoil, grass or vegetation to restrain silt run-off. The control of silt runoff is to be included as part of site wide maintenance regimes.
- CAT 1 waste compounds must be isolated at all times from any drainage or watercourse receptors, this includes pipes, permeable paving, ditches and swales.

Measures with Section 4.3 for Air Quality and Emissions, and measures within Section 4.8 for Housekeeping would be undertaken to prevent pollution.

Reporting incidents:

In the event of a pollution event, the following measures would be undertaken:

- A statement of appropriate information (i.e. Incident Report) would be provided in the event of any incident such as a spillage or release of a potentially hazardous material.
- Appropriate emergency services, authorities and personnel on the construction-site would be notified.
- Relevant statutory bodies, environmental regulatory bodies, local authorities and local water and sewer providers would be notified of pollution incidents, as required.

4.13 Traffic Management

Works would be carried out in accordance with a Traffic Management Plan (Appendix J) to be produced by the contractor.

Procedure

The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- All public access would be maintained where applicable.
- Measure would be in place to ensure that the local community, economy and transport networks can continue to operate effectively.
- Identify permitted access routes and access for construction traffic, site boundaries, main access / egress points for work sites and compounds.
- No off-site parking permitted.
- Ensure that HGV movements are controlled on-site by marshalling.
- Ensure local community are informed of the proposals.
- Ensure that PROW diversions are appropriately posted.
- All practical measures would be put in place to avoid / limit and mitigate the deposition of mud and other debris on the highway, these would include:
  - Hardstanding at the access and egress points would be cleaned at appropriate intervals
  - Vehicle wash-down points to clean vehicle wheels at each exit point on to the highway.
  - The correct loading of vehicles and sheeting of loads where necessary to avoid spillage during their journeys.
  - Appropriate wheel-cleaning measures would be employed to prevent the transfer and accumulation of mud and other granular deposits on the public highway.
  - The use of mechanical road sweepers combined with water sprays for the suppression of dust to clean hardstanding's, roads and footpaths in the vicinity of the site.
  - Measures to avoid water run-off on to the adjacent highway (footways or carriageways), including avoiding ponding adjacent to hoardings on the carriageway.
  - Ensure that no material is deposited on to the public highway which would affect drainage interceptors, etc.
  - The flushing of gullies in the vicinity of the site.

4.14 Waste Management

Procedure

The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

Minimisation of waste:

The Principal Contractors would implement measures to minimise the waste generated during construction such as:

- 'Just in time' deliveries.
- Careful storage of materials on-site.
- Minimisation of packaging.
- Use of re-usable packaging.

Management of excavated materials and waste:

Where possible, ensure that the waste hierarchy is followed when dealing with waste on-site: prevention, re-use and preparation for re-use, recycle, recovery, and disposal. Opportunities include:

- Re-use of excavated soils on-site.
- Chipping green waste for use in the landscaping.
- Re-use of surplus excavated materials on other nearby schemes or for uses with benefits to the environment, such as in the restoration of nearby quarries or other excavation sites.

A Materials Management Plan (Appendix I) has been prepared and would be maintained by the Principal Contractors

Identification and classification of waste:

- A Site Waste Management Plan (SWMP) has been prepared (Appendix H) and would be maintained by the Principal Contractors.
- Waste would be classified in accordance with the statutory controls governing the management of inert, non-hazardous and hazardous waste.
- If asbestos is identified on-site, it would be removed by suitably licensed asbestos removal contractor and managed in accordance with the relevant statutory controls governing its disposal.

Segregation and storage of waste:

- Skips and other storage receptacles used for the containment of construction, demolitions and excavation waste would be colour-coded in line with generic scheme developed by the Institution of Civil Engineers.
- Hazardous waste and non-hazardous waste must be stored separately. The mixing of hazardous and non-hazardous waste, either whilst stored on-site or upon collection would not be permitted.
- All skips and other storage receptacles would have appropriate signage to facilitate separation of waste for re-use, recycling, or disposal. Plastic sheeting would be used to prevent leaching from waste soils and aggregates where these are not contained within skips or other storage receptacles.
- All skips and storage receptacles would be sheeted, or otherwise remain lidded or closed, when waste is not being deposited into them. They would also be covered to prevent the escape of waste whilst in transit and loaded for maximum payload efficiency.
- All skips and storage receptacles would be inspected on arrival to ensure they are fit for purpose. Any not fit for purpose would be taken out of use immediately with appropriate signage to signify it should not be used.
- Liquid waste would be stored on hard-surfaced areas with secondary containment systems to prevent spillages.
- Waste would not be stored within 10m of any controlled watercourse, borehole, well, spring, surface water drainage system or foul water drainage system.
- The storage and segregation of waste would comply with any air quality management measures in Section 4.3.
- Storage receptacles would be used for the collection and storage of waste within site operation facilities to facilitate the segregation of waste for re-use, re-cycling and recovering.

Duty of care requirements and authorisations:

- The Principal Contractors and all sub-contractors would maintain a duty of care at all times to ensure that waste generated during the construction period is handled in accordance with the relevant legislation governing its storage, transfer, treatment and disposal.
- All relevant authorisations required would be in place prior to the removal of any waste from the site, with an up-to-date register maintained. This would be in relation to the transfer of waste (waste carriers), any off-site waste management facilities (permitted or exempt sites) to which waste is taken, and any requirements for hazardous waste premises notification.
- An environmental permit or registered exemption would be in place prior to any on-site transfer, treatment or disposal of waste being undertaken.
- Any waste leaving the site would be accompanied by appropriate duty of care documentation in line with the relevant statutory requirements for waste transfer and hazardous wastes (as appropriate).
- Duty of care documentation would be retained by the contractors in line with statutory requirements.
- The contractor would maintain a register of all waste loads leaving the site and/or a tracking system (defined in the Materials Management Plan in Appendix I) for excavated material destined for re-use to provide a suitable audit trail and to facilitate monitoring and reporting of waste and material types, quantities and management methods.

4.15 Water Management

There are no surface watercourses within the scheme boundary. A main river (Old Mill Stream) is located approximately 100m north of the scheme. Kent Greensand Eastern Water Framework Directive (WFD) groundwater bodies underlies the whole of the site. The scheme is located approximately 100m north of East Stour WFD surface water body (GB107040019640), approximately 200m south of Aylesford Stream WFD surface water body (GB107040019650), and approximately 5km south of Great Stour between Ashford and Wye WFD surface water body (GB107040019741).

The scheme is not located within a Source Protection Zone or any Drinking Water Protected Area or Safeguard Zone for surface water or groundwater.

The entire scheme is located within a surface water Nitrate Vulnerable Zone (NVZ) (ID: 515 – R. Great Stour) and a groundwater NVZ (ID: 64 – Maidstone). There are no underlying superficial aquifers, however, there is a bedrock aquifer in the Hythe Formation, which is designated as a principal aquifer. This is listed as high for groundwater vulnerability.

The proposed site is located within Flood Zone 1 and is approximately 200m south of Flood Zones 2 and 3.

Procedure

The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

Construction activities must be managed in accordance with CIRIA Guidelines. Guidance on best practice in relation to pollution prevention and water management is set out in the following documents:

- CIRIA's Environmental good practice on-site[10].

[10] CIRIA (2015) *Environmental good practice on-site guide.* ISBN: 978-0-86017-746-3.

- Environment Agency's Protect groundwater and prevent groundwater pollution[11].

Measures to be implemented to limit the impact of construction activities on the water environment include:

- All construction workers to be briefed on the use of spill kits as part of the site induction.
- Any stockpiled materials to be stored within enclosed areas to enable the capture of the run-off to be stored and treated where required.
- All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas.
- Pollution Prevention & Control and spill response procedures to be developed by the contractor and a spill kit and clean up equipment maintained on-site.
- Approval from the relevant regulatory body would be sought for plans of work likely to affect any surface or groundwater resource.
- The necessary approvals would be obtained to enable discharge of dewatering, surface water run-off and wastewater from the construction site to soakaway or filtration systems, watercourses, foul sewers or disposal off-site.
- Bunds of non-erodible or silt or sediment fences would be installed where appropriate to avoid surface run-off to watercourses.
- As far as is reasonably practicable, the good working practices detailed in the Environment Agency's pollution prevention guidelines would be adopted.
- Use of temporary construction methods from the following CIRIA publications (including C532: Control of water pollution from construction sites[12]; C648: Control of water pollution from linear construction projects: technical guidance; and C649: Control of water pollution from linear construction projects: site guide[13]).
- All construction activities would be undertaken having regard to the requirements to avoid any significant increase of flood risk.
- All watercourses would be kept cleat of obstruction and debris to reduce blockage risk, this includes pipes, permeable-paving, ditches and swales.
- Suitable access and safe refuges are to be identified for use in the event of a flood.
- The contractor would consult with the relevant regulatory authority and other relevant risk management authorities on areas at risk of flooding and make appropriate use of the Environment Agency's Floodline Warning Direct service for works within areas at risk of flooding.
- Flood risk would be managed safely throughout the construction and implementation period and consider flooding when planning sites and storing materials.
- CAT 1 waste compounds must be isolated at all times from any drainage or watercourses, these compounds are to be covered and the rain down pipe to be directed to a suitable surface watercourse receptor
- A risk-based precautionary approach using the 'source-pathway-receptor' concept would be applied to temporary and permanent works.

[11] Environment Agency (2017) *Protect groundwater and prevent groundwater pollution.* Available at: https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution

[12] CIRIA (2001) *Control of water pollution from construction sites. Guidance for consultants and contractors (C532D).* ISBN: 978-0-86017-532-2.

[13] CIRIA (2006*) Control of water pollution from linear construction projects. Site guide (C649).* ISBN: 978-0-86017-649-7.

The measures set out in Section 4.3 regarding air quality and emissions measures to limit adverse dust and air pollution and Section 4.12 regarding pollution prevention associated with construction works would apply equally in relation to limiting the likelihood of polluted surface water run-off being generated.

4.16 Unexploded Ordnance

It is not anticipated that there would be any unexploded ordnance encountered during the works.

Procedure

Should any unexploded ordinance be encountered on-site the following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:

- Works would stop immediately, and the area evacuated and secured.
- The police would be notified via the site Project Manager.

5 Monitoring, Auditing and Reporting

5.1 Introduction

Monitoring and reporting of the project's performance against its environmental and social mitigation requirements would be carried out throughout construction.

5.2 Environmental Site Supervision

The Principal Contractors would assign an Environmental Manager to the site. The Environmental Manager would be responsible for supervising the overall environmental performance of the site. It is not anticipated that qualified specialists would be required to oversee any construction works as relevant surveys have been completed ahead of construction. Should at any point during construction a suitably qualified specialist such as an ecologist, archaeologists etc, be required to oversee construction works unexpectedly, the Principal Contractors would ensure these roles are provided.

The contractor would review all environmental issues at progress meetings. Environmental issues would be communicated to all project personnel by inductions, toolbox talks and daily briefings. Acknowledgment of requirements would be recorded for all site personnel.

5.3 Environmental Inspections, Audits and Registers

The Principal Contractors would be responsible for all environmental inspections, audits and maintenance of risk, incident and consent registers. Environmental performance / compliance would be monitored against the measures set out in this CMP.

Environmental inspections would be undertaken daily and a record maintained. These inspections would focus on key areas where the environmental risks are most prevalent.

Due to the short construction period of the site (assumed 40 weeks), a pre-construction audit, one audit during construction, and a post-construction audit would be undertaken by the Principal Contractors. Audits would cover the whole construction site.

5.4 Compliance and Non-Conformance / Corrective Action Reports

If a non-compliance with the CMP is identified, all personnel involved would be informed and corrective action notices served. Corrective actions would be addressed in both the short and long-term, and these actions would be shown to be effective and compliant with measures set out in the CMP. Short-term actions would address the immediate effects of non-compliance, while long-term actions would address the cause and look to prevent any further incidences of the same nature.

The Principal Contractors would have in place effective arrangements to investigate and provide reports on any potential or actual significant pollution incidents including:

- A description of the incident, location, type and quantity of containment and likely receptor.
- Contributory cause.
- Affects.
- Measures implemented to mitigate effects.
- Measures implemented to reduce the risk of similar incidents occurring.

Prior to the issue of corrective action notices, the Environmental Manager would discuss the impacts of the non-compliance with the Project Manager. The Environmental Manager would issue corrective action notices with timescales for rectifications.

5.5 Review and Reporting

At the end of the project the Principal Contractors would compile and produce an end of Project Environmental file as part of hand-over documentation. This file would contain all records of inspections, audits, registers, briefings and incidences.

A. Non-Technical Summary - Schedule of Environmental Requirements and Mitigation

Table 5.1: Non-Technical Summary: Schedule of Environmental Requirements and Mitigation

Timeframe	Topic	Mitigation Measure	By Who?
During Construction	1. Air Quality and Emissions	Works would be carried out in accordance with Best Practicable Means, as described in Section 79 (9) of the Environmental Protection Act 1990, to reduce the creation of dust on-site. This would include: • Minimise height of stockpiles and profile to minimise wind-blown dust emissions and risk of pile collapse. • Locate stockpiles out of the wind and seeded to minimise the potential for dust generation. • Ensure that all vehicles with open loads of potential dusty materials are securely sheeted or enclosed. • Enforce a maximum speed limit of 15mph on surfaced roads and a 10mph speed limit on unsurfaced haul roads and work areas, to prevent the generation of dust by fast moving vehicles. • Damp down surfaces in dry conditions. □ All vehicle engines and plant motors shall be switched off when not in use • The use of mains electrical power, hybrid generator systems and battery powered equipment where reasonably practical. • All plant on-site would be in good operating condition. Exhaust emission from all plant would be reduced as much as possible by effective and regular maintenance. • Low sulphur diesel fuel would be used in all plant (non-road mobile machinery). • The Principal Contractors would maintain a register of all plant on-site to record inspection and set up a system of regular inspection of all plant. • Vehicle and construction plant exhausts would be directed away from the ground and position them at a height to facilitate appropriate dispersal of exhaust emissions. • The placement of stone / soils / concrete by plant or equipment would be under control and as low as reasonably practicable to prevent undue creation of dust. • Dust suppression systems to be in place where there is a foreseeable risk to air quality in accordance with Class Approval 6 Dust Suppression. • Vehicles transporting materials within or outside the construction site would not be overloaded. • Check site accesses and local roads daily for mud and arrange for it to be cleaned immediately should it be required. • No open fires to be permitted on-site and measures to minimise fire risk are implemented, where relevant. • Movement of construction traffic around site would be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the project.	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?

	2. Archaeology and Built Heritage	• Archaeological investigation is being undertaken as part of recommendations for the previously consented scheme in line with the requirements set out in the Written Scheme of Investigation Technical Covering Note (419419-MMD-XX-SV-RP-HE-0001):
		  Strip, map and sample of areas west of Highfield Lane which were identified by the previous development application
		  Trial trenching of the area south of Highfield Lane
		• In addition, archaeological investigation in the eastern field will be undertaken following production of an agreed Written Scheme of Investigation:
		  Strip, Map and Sample of areas affected by the eastern compound;
		  Investigation of the archaeology within the eastern field.
		• Implementation of the design measures and landscaping planting included in the Environmental Masterplan.
			Principal Contractors and any sub-contractors

	3. Carbon	The following carbon reduction principles as detailed within Section 3 of the Carbon Assessment and Reduction Report would be considered by the Principal Contractors and all sub-contractors for the duration of construction of the scheme: • Transportation of materials to site would prioritise low-carbon modes where possible. • Where possible, low-carbon construction materials and products would be preferred. • Where possible low-carbon construction plant and equipment would be used. • Provision would be made to enable waste to be effectively segregated during construction, enabling materials to be effectively managed using the waste hierarchy, prioritising re-used and recycling over disposal. • Circular economy principles, such as Modern Methods of Construction, would be implemented, where possible.	Principal Contractors and any sub-contractors
	4. Construction Materials, Sourcing, Management and Storage	The following measures to reduce impact on material resources would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme: • Re-use site won materials where possible. • Use locally sources materials. • Ensure materials are delivered on an as and when basis to avoid damage or contamination. • Use pre-cast elements where possible. The following measures to re-use materials in landscaping bunds would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?
		• All suppliers would be issued specific site routing arrangements in conjunction with the Traffic Management Plan (Appendix J) to enable efficient delivery of all materials to ensure all materials are handled and located in the correct storage areas to minimise the risk of damage as far as is practically possible. • Site Plans would be issued and displayed indicating all material storage areas. These arrangements would be regularly monitored, reviewed and all changes updated and communicated to all connected and associated parties. • Site Plans would be displayed at appropriate locations – Site Canteen, Site Entrance and the Gateman's Hut, indicating the Site Waste Management Storage areas. Consideration would be given to ensure that they are positioned appropriately in clear view, not obstructed by the works or material storage. These areas would regularly be reviewed to ensure that they are appropriately positioned and re-located where deemed necessary. • Senior Site Manager would be appointed as the "waste champion" overseen by the Building Manager. • Disposal routes for expected hazardous waste including contact details – Licenced Contractor Details TBC. Details of procedure on discovering unexpected hazardous waste including contact details – Waste would be separated if appropriate, WAC (waste acceptance criteria) tested and categorised prior to removal by a licenced contractor appropriate to the waste category. • Numbers of containers e.g. number of central skips, number of mini skips, wheelie bins or bags at work face to be reviewed daily throughout the project. • Arrange colour coding, order / develop posters. The site would adhere to the National Colour Coding scheme for waste segregation. • Local recovery routes for waste streams, recyclers and waste contractors to be finalised. The following measures to ensure quality of stockpiled soil is maintained would be implemented by the Principal Contractors and any sub-contractors: • The stockpile should be managed in line with the Department for Environment Food and Rural Affairs (Defra) *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*. • The stockpile must be removed by 31 July 2022. • The stockpile should be seeded to maintain quality of soil.	
	5. Ecology	To limit disturbance to habitats and protected species, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme. Please refer to Appendix K for the full Framework Ecological Management Plan: • Best practice measures would be employed on-site to minimise impacts due to construction noise, dust and water pollution as far as possible in line with Section 1, 9 and 13 of this table.	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?

		• Ensure lighting is managed in accordance with Section 8 of this table.
		• Careful siting of haul routes, materials storage areas, compounds, lighting and generators away from sensitive habitats.
		• Night-time working would not be allowed during the months when bats are actively foraging (April to October inclusive) to prevent lighting disturbance to foraging bats.
		
		To reduce habitat loss and degradation, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme. Please refer to Appendix L for the full Arboricultural Report:
		• Existing trees and vegetation to be retained (including hedgerows) would be protected during the construction phase with protective fencing.
		• Protective barriers should be installed in accordance with BS5837:2012 around all of the trees and groups that are due to be retained, at the distances dictated by the Root Protection Area (RPA) dimensions stated in Table 3.4 of the Stour Park Pre-Development Arboricultural Survey (Report No: RT-MME-120243-08) to protect these trees.
		• An Arboriculturalist should attend site prior to commencement of the works to confirm the final positioning of the protective barrier.
		• For the location and alignment of the temporary protective barriers required for the additional trees and groups that have been removed or retained as part of the Sevington Inland Border Facility (IBF) works, refer to the Tree Protection Plans (418703-MMD-XX-SV-VS-YB-0001-04). For the location and alignment of the temporary protective barriers required for trees and groups that have not changed, refer to the Stour Park West AIA.
		• The area within the protective barriers i.e. tree side, would be a (CEZ) for the duration of the works.
		• All weather notices should be erected on the barrier with words such as: “Tree Protection Area — Keep out”.
		• The following prohibitions shall also apply within the area enclosed by the temporary protective barriers:
		  No mechanical digging or scraping.
		  No storage of plant, equipment or materials.
		  No vehicular or plant access.
		  No fire lighting within 10m of tree canopies.
		  No handling, discharge or spillage of any chemical substance, including cement washings and vehicle washings within 10m.
		  No action likely to cause localised waterlogging.	

Timeframe	Topic	Mitigation Measure	By Who?

- No alteration of ground levels.
- No construction of hard surfaces.
- No attachment of boards, hoarding, cables or notices or fencing to trees.
- No storage of excavated materials.

- Special care is to be taken on sloping ground where spillages could run towards the trees. A collecting channel dug along the outer line of the protective fencing would be one method of avoiding such damage.
- If excavators are to be used during construction, at no time is the excavating arm to encroach over the position of the tree protection barriers.
- All construction compounds, storage facilities and deliveries must aim to make use of existing hard surfaces to avoid unnecessary compaction within RPAs. If compounds require siting within RPAs, appropriate footings or ground cover must be used to avoid root damage or compaction of the soil and siting must ensure that any damage to aerial parts of retained trees is avoided.

To protect reptile populations on-site, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme:

- A Reptile Mitigation Strategy would be implemented in order to protect the reptile populations during construction. The following methodologies and techniques would be used prior to construction commencing:
  - Receptor site review.
  - Habitat manipulation.
  - Trapping and translocation.
  - Supervised soil strip.
  - Sensitive timing of works.
  - Worker awareness and sympathetic working practice.

The following measure to protect badger populations would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Closure of badger sett under a Natural England Licence.

The following measure to protect dormice populations would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme:

- Removal of dormouse habitat under a Natural England licence and ensure sensitive method of vegetation clearance, in accordance with best practice.

Timeframe	Topic	Mitigation Measure	By Who?
		The following measures to prevent disturbance to breeding and wintering birds would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme: • Vegetation clearance would be programmed to avoid the nesting bird season (March – August inclusive) if possible. • Where this is not possible a breeding bird survey would be carried out by an ecologist 48-hours in advance of proposed clearance works to check for bird nesting activity. • If active nests are found a buffer of vegetation shall be retained until all young have fledged and the nest is deemed inactive by an ecologist. The following measure to provide new habitats on-site would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme: • Implementation of the design measures and landscaping planting included in the Environmental Masterplan including the erection of ten bird, ten bat and six dormouse boxes. The following measure would be implemented to manage newly created habitats would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme. Please refer to Appendix M for the full Landscape and Ecological Management Plan: • A five-year aftercare to follow completion of the works. Maintenance activities to be undertaken to ensure the successful establishment of planting and provision of new function habitats. This would include the replacement of defective plants.	
	6. Housekeeping	To reduce the likelihood of an environmental incident or nuisance occurring, the following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme: • Treatment of perimeters, cleanliness on-site, provision of staff facilities, waste management. • Effective preventative pest and vermin control and prompt treatment of any pest and vermin infestation, including arrangements for disposing of food waste or other attractive material, if an infestation occurs, the contractor would take action to eliminate the infestation and prevent further occurrence. • Water management measures would be adhered to in line with Section 13 of this table. • Measures to minimise Noise and air quality emissions would be implemented in line with Sections 1 and 9 of this table. • Storage of machinery, equipment and temporary building outside flood risk areas where possible. • Management of staff congregating outside the site prior to commencing or leaving site. • Security measure would be installed to prevent intrusion into residential properties.	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?
		• Maps showing sensitive areas and buffer zones where no pollutants are to be stored or used would be displayed in all welfare facilities. • Adequate welfare facilities would be provided. • A construction worker travel plan would be implemented to encourage use of public transport by site staff and control off-site parking	
	7. Landscape and Visual	In order to limit visual intrusion and impacts upon landscape character, the following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of construction of the scheme: • Prioritise their creation early in the construction period to aid screening of lower level activity. • Seeded as priority to 'green up' earthworks. • Implementation of planting in the first planting season to aid the integration of the scheme with the surrounding landscape. The following measures would be implemented during construction of temporary stockpiles by the Principal Contractors and all sub-contractors: • Kept to a maximum 2m in height. • Located as far away as possible from properties on Kingsford Street. • The 'active' side of the stockpile should be restricted to the western edge, adjacent to Highfield Lane which would aid screening of any soil and plant movements. • Stockpile should be seeded as a priority. The remaining faces of the stockpiles should be left inactive to limit visual intrusion upon neighbouring residential receptors. The following measure to be undertaken to reduce visual intrusion and impacts upon the landscape would be implemented by the Principal Contractors and any sub-contractors for the duration of construction of the scheme: • Keep a well-managed and tidy site, with construction materials delivered on an as and when needed basis to reduce material stockpiles on-site The following measure to limit visual intrusion and impacts upon landscape character would be implemented by the Principal Contractors and any sub-contractors: • Implementation of the design measures and landscaping planting included in the Environmental Masterplan	Principal Contractors and any sub-contractors
	8. Lighting	• Lighting would be at the minimum luminosity necessary and use low-energy-consumption fittings. • Where necessary, lighting to site boundaries would be provided and illumination would be sufficient to provide a safe route for the passing public.	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?

		• Where appropriate, lighting would be activated by motion sensors to prevent unnecessary usage.
		• Lighting would comply with the Institute of Lighting Professionals' *Guidance notes for the reduction of obtrusive light* and the provisions of BS 5480, *Code of practice for the design of road lighting,* where applicable.
		• Lighting would be designed, positioned and directed so as not to unnecessarily intrude on any adjacent buildings, ecological receptors, structures used by protected species and other land uses to prevent unnecessary disturbance.
		• The positioning and design of temporary lighting to be installed during the construction work would be considered in relation to:
		  Minimum requirements for transport users.
		  Safe operation of the railway and roads.
		  Requirements for least disturbance to local ecology.
		  Energy efficiency, ease of maintenance and disposal of light units (LED to be considered).
		  Construction site lighting should be directed away from any sensitive receptors.
		• Lighting columns powered off the mains would be used as a first priority but if not then either hybrid powered lighting columns or string (generator powered) lights would be used. Security lighting would be as low as reasonable during night-time periods.
		• All lighting shall be switched off when not in use.	

	9. Noise and Vibration	The following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme: • All noisy operations would be completed between 08:00 to 18:00 on weekdays and 08:00 to 13:00 on Saturdays wherever possible. • Switching off noise-emitting equipment when not in use and the use of temporary noise barriers where appropriate. • Activities conducted during night-time working (between 23:00-07:00) would not exceed 45 dB as per clause E3.2 from BS5228-1[1]. • Any activities identified that could be undertaken outside of the working hours and limits set out above would require prior agreement with Ashford Borough Council and subject to a Section 1 Agreement. • Construction works would comply with the recommendations for practical measures to minimise noise and the maximum permissible noise limits set out in BS5228-1. Should construction activities be identified that	Principal Contractors and any sub-contractors

[1] BS 5228-1:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites.

Timeframe	Topic	Mitigation Measure	By Who?
		could exceed these limits, prior agreement would be sought with Ashford Borough Council. In order to inform the establishment of suitable noise limits it is expected that a baseline noise monitoring survey would need to be undertaken at representative receptor locations based on a recognised standard such as BS 7445-1:2003 Description and Measurement of Environmental Noise. The following measures to limit noise emissions would be implemented by the Principal Contractors and any sub-contractors for the duration of the construction of the scheme: • Ensure equipment is maintained, in good working order, and is used in accordance with the manufacturer's instructions. • Fit equipment with silencers or mufflers. • Manage deliveries to prevent queuing of site traffic. • Do not leave plant running unnecessarily. • Careful orientation of plant with directional features. • Materials to be lowered instead of dropped from height. • Use of adjustable or directional audible vehicle-reversing alarms or use of alternative warning systems (for example, white noise alarms). • Train and advise members of the construction team during toolbox talk briefings on quiet working methods. • Erect temporary barriers to fully obscure the construction works from nearby receptors. The following measures to mitigate the effects of stockpiling activity would be implemented by the Principal Contractors and any sub-contractors for the duration of the construction of the scheme: • Position stockpiled material closest to the residential receptors first to ensure a bund between the works and the receptors is formed. Vibration would also be assessed and when a task has been identified that requires the use of a vibrating tool with a vibration frequency of 2.5 m/s2 or higher, then form GP.1124.F01 Hand Arm Vibration Calculator Permit would be completed. This form identifies: • Action limit time - this is where the task can be carried out with no further actions required. • Daily limits - this is the maximum exposure time on that piece of equipment/tool exposure - measured in m/s^2. When 2.5m/s2 over an eight hour day is exceeded, the GP.1124.F01 chart would change from green to amber. At this stage, consideration must be given to control measures such as reducing the tool / equipment vibration frequency, reducing the exposure time, task rotation etc.	

Timeframe	Topic	Mitigation Measure	By Who?
		Persons operating vibrating / power tools / equipment etc. must not be exposed to any frequency / time combination which indicates red on the chart.	
	10. Pollution Prevention and Control	To reduce the likelihood of an environmental incident or nuisance occurring, the following measure would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme: • Activities must be managed in accordance with Construction Industry Research and Information Association (CIRIA) Guidelines and Environment Agency's Protect groundwater and prevent groundwater pollution. • Stationary plant would be used with secondary containment measures such as plant nappies to retain any leakage of oil or fuel, which would be emptied at regular intervals to prevent overflow. • Fuel would be stored in dedicated bunded, impervious storage areas away from drains and watercourses. • Fuel tanks would be stored within a bund capable of holding 110% of their capacity. • Spillage kits would be stored at key locations on-site as set out in a pollution incident control plan and in particular refuelling areas. Spillage kits would also be kept with mobile bowsers. • Plant chemical absorbant pads and drip trays would be in use during the refuelling process to catch any drips or spills between bowser and machinery. • Refuelling operations would only be undertaken by designated refuellers in line with refuelling procedures. • All staff would be trained to use spill kits efficiently. • The contractors would consult with the relevant regulatory bodies regarding specific requirements in relation to establishing and operating concrete batching plants on-site. Wash water from any batching plants would not be discharged to the water environment without the approval of the relevant authority. • The contractors / site operator would keep a record of all spillage incidents and inform the nominated undertaker should any spills occur which could cause land contamination or pollution off-site and provide records to the Environment Agency if required. • The principal contractors would manage and dispose of foul water and sewage effluents from site facilities, complying with PPG4: Treatment and disposal of sewage where no foul sewer is available, the Environment Agency's guidance document Groundwater protection: Principles and practice (GP3). • Containment by temporary foul drainage facilities and disposal off-site by a licensed contractor. • By preference, connection to the local foul sewer system as agreed with the relevant authorities. • Where foul sewage is not present, discharge to a watercourse or soakaway is not permitted.	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?

		• Any foul drainage discharge to the public sewer would require approval from the statutory water undertaker, Southern Water. If not permitted, provisions need to be adopted to remove the liquid from site for disposal, such as via a tanker.
		• Any waste or foul water that is tankered offsite must be taken to a wastewater treatment works outside of the Stour Valley catchment under trade effluent licence.
		• Provision of maps showing the locations, together with address and contact details, of local emergency services facilities (e.g. police stations, fire authorities, medical facilities and other relevant authorities).
		• Provision of contact details for the relevant authorities, such as the Environment Agency, and the persons responsible on the construction site and within the contractors' organisation for pollution incident response.
		• Provision of contacts with a competent spill response company which can be contacted at short notice for an immediate response (where appropriate).
		• Ensure staff competence and awareness in implementing plans and using pollution response kit.
		• Ensure that site drainage plans and flood risk management plans are available on-site and are kept up to date.
		• Ensure that pollution shut-off / penstock valves are used in compounds with formal drainage.
		• Any stockpiled materials to be stored within enclosed areas to enable the run-off to be stored and treated where required.
		• All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas.
		• Extra vigilance shall be required to avoid silt run off and its impact on the drainage system from construction activities. This shall include cut-off ditches for landscape not established, seeding to retain topsoil, grass or vegetation to restrain silt run-off. The control of silt runoff is to be included as part of site wide maintenance regimes.
		• Measures within this table Section 1 for Air Quality and Emissions, and 6 for Housekeeping would be undertaken to prevent pollution.
		• In the event of a pollution event the following measures would be undertaken:
		  ◦ A statement of appropriate information would be provided in the event of any incident such as a spillage or release of a potentially hazardous material.
		  ◦ Notification of appropriate emergency services, authorities and personnel on the construction site.
		  ◦ Notification of relevant statutory bodies, environmental regulatory bodies, local authorities and local water and sewer providers of pollution incidents, where required.	

Timeframe	Topic	Mitigation Measure	By Who?

	11. Traffic Management	The following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:
		• All public access would be maintained where applicable.
		• Measure would be in place to ensure that the local community, economy and transport networks can continue to operate effectively.
		• Identify permitted access routes and accessed for construction traffic, site boundaries, main access/egress points for worksites and compounds.
		• No off-site parking permitted.
		• Ensure that HGV movements are controlled on-site by marshalling.
		• Ensure local community are informed of the proposals.
		• Ensure that the reinstated PROW that had been permanently or temporarily closed are clearly signposted to ensure journey times for WCH can be updated.
		• All practical measures would be put in place to avoid / limit and mitigate the deposition of mud and other debris on the highway, these would include:
		  Hardstanding at the access and egress points would be cleaned at appropriate intervals.
		  Vehicle wash-down points to clean vehicle wheels at each exit point on to the highway.
		  The correct loading of vehicles and sheeting of loads where necessary to avoid spillage during their journeys.
		  Appropriate wheel-cleaning measures would be employed to prevent the transfer and accumulation of mud and other granular deposits on the public highway.
		  The use of mechanical road sweepers combined with water sprays for the suppression of dust to clean hardstanding's, roads and footpaths in the vicinity of the site.
		  Measures to avoid water run-off on to the adjacent highway (footways or carriageways), including avoiding ponding adjacent to hoardings on the carriageway.
		  Ensure that no material is deposited on to the public highway which would affect drainage interceptors, etc.
		  The flushing of gullies in the vicinity of the site.
			Principal Contractors and any sub-contractors

	12. Waste Management	Minimisation of waste:	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?

		• The Principal Contractors would implement measure to minimise the waste generated during construction such as:
		  ‘Just in time’ deliveries.
		  Careful storage of materials on-site.
		  Minimisation of packaging.
		  Use of re-usable packaging.
		Management of excavated materials and waste:
		• Where possible, ensure that the waste hierarchy is followed when dealing with waste on-site: prevention, re-use and preparation for re-use, recycle, recovery, and disposal. Opportunities include:
		  Re-use of excavated soils on-site.
		  Chipping green waste for use in the landscaping.
		  Re-use of surplus excavated materials on other nearby schemes or for uses with benefits to the environment, such as in the restoration of nearby quarries or other excavation sites.
		• Production of a Materials Management Plan for the re-use of excavated material on-site.
		Identification and classification of waste:
		• A SWMP would be prepared and maintained by the Principal Contractors.
		• Waste would be classified in accordance with the statutory controls governing the management of inert, non-hazardous and hazardous waste.
		• If asbestos is identified on-site, it would be removed by suitably licensed asbestos removal contractor and managed in accordance with the relevant statutory controls governing its disposal.
		Segregation and storage of waste:
		• Skips and other storage receptacles used for the containment of construction, demolitions and excavation waste would be colour-coded in line with generic scheme developed by the Institution of Civil Engineers.
		• Hazardous waste and non-hazardous waste must be stored separately. The mixing of hazardous and non-hazardous waste, either whilst stored on-site or upon collection would not be permitted.
		• All skips and other storage receptacles would have appropriate signage to facilitate separation of waste for re-use, recycling, or disposal. Plastic sheeting would be used to prevent leaching from waste soils and aggregates where these are not contained within skips or other storage receptacles.	

Timeframe	Topic	Mitigation Measure	By Who?
		• All skips and storage receptacles would be sheeted, or otherwise remain lidded or closed, when waste is not being deposited into them. They would also be covered to prevent the escape of waste whilst in transit and loaded for maximum payload efficiency. • All skips and storage receptacles would be inspected on arrival to ensure they are fit for purpose. Any not fit for purpose would be taken out of use immediately with appropriate signage to signify it should not be used. • Liquid waste would be stored on hard-surfaced areas with secondary containment systems to prevent spillages. • Waste would not be stored within 10m of any controlled watercourse, borehole, well, spring, surface water drainage system or foul water drainage system. • The storage and segregation of waste would comply with any air quality management measures in Section 1 of this table. • Storage receptacles would be used for the collection and storage of waste within site operation facilities to facilitate the segregation of waste for re-use, re-cycling and recovering. Duty of care requirements and authorisations: • The Principal Contractors and all sub-contractors would maintain a duty of care at all times to ensure that waste generated during the construction period is handled in accordance with the relevant legislation governing its storage, transfer, treatment and disposal. • All relevant authorisations required would be in place prior to the removal of any waste from the site, with an up-to-date register maintained. This would be in relation to the transfer of waste (waste carriers), any off-site waste management facilities (permitted or exempt sites) to which waste is taken, and any requirements for hazardous waste premises notification. • All environmental permit or registered exemption would be in place prior to any on-site transfer, treatment or disposal of waste being undertaken. • Any waste leaving the site would be accompanied by appropriate duty of care documentation in line with the relevant statutory requirements for waste transfer and hazardous wastes (as appropriate). • Duty of care documentation would be retained by the contractors in line with statutory requirements. • The contractor would maintain a register of all waste loads leaving the site and/or a tracking system (defined in the Materials Management Plan) for excavated material destined for re-use to provide a suitable audit trail and to facilitate monitoring and reporting of waste and material types, quantities and management methods.	
	13. Water Management	The following measures would be implemented by the Principal Contractors and all sub-contractors for the duration of the construction of the scheme:	Principal Contractors and any sub-contractors

Timeframe	Topic	Mitigation Measure	By Who?
		Construction activities must be managed in accordance with CIRIA Guidelines. Guidance on best practice in relation to pollution prevention and water management is set out in the following documents: • CIRIA's Environmental good practice on-site[14]. • Environment Agency's Protect groundwater and prevent groundwater pollution[15]. Measures to be implemented to limit the impact of construction activities on the water environment include: • All construction workers to be briefed on the use of spill kits as part of the site induction. • Any stockpiled materials to be stored within enclosed areas to enable the capture of the run-off to be stored and treated where required. • All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas. • Pollution prevention & Control and spill response procedures to be developed by the contractor and a spill kit and clean up equipment maintained on-site. • Approval from the relevant regulatory body would be sought for plans of work likely to affect any surface or groundwater resource. • The necessary approvals would be obtained to enable discharge of dewatering, surface water run-off and wastewater from the construction site to soakaway or filtration systems, watercourses, foul sewers or disposal off-site. • Bunds of non-erodible or silt or sediment fences would be installed where appropriate to avoid surface run-off to watercourses. • As far as is reasonably practicable, the good working practices detailed in the Environment Agency's pollution prevention guidelines would be adopted. • Use of temporary construction methods from the following CIRIA publications (including C532: Control of water pollution from construction sites; C648: Control of water pollution from linear construction projects: technical guidance; and C649: Control of water pollution from linear construction projects: site guide). • All construction activities would be undertaken having regard to the requirements to avoid any significant increase of flood risk. • All watercourses would be kept cleat of obstruction and debris to reduce blockage risk, this includes pipes, permeable-paving, ditches and swales.	

[14] CIRIA (2015) *Environmental good practice on-site guide.* ISBN: 978-0-86017-746-3.

[15] Environment Agency (2017) *Protect groundwater and prevent groundwater pollution.* Available at: https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution

Timeframe	Topic	Mitigation Measure	By Who?
		• Suitable access and safe refuges are to be identified for use in the event of a flood. • The contractor would consult with the relevant regulatory authority and other relevant risk management authorities on areas at risk of flooding and make appropriate use of the Environment Agency's Floodline Warning Direct service for works within areas at risk of flooding. • Flood risk would be managed safely throughout the construction and implementation period and consider flooding when planning sites and storing materials. • A risk-based precautionary approach using the 'source-pathway-receptor' concept would be applied to temporary and permanent works. • CAT 1 waste compounds must be isolated at all times from any drainage or watercourses, these compounds are to be covered and the rain down pipe to be directed to a suitable surface watercourse receptor The measures set out in Section 1 of this table regarding air quality measures to limit adverse dust and air pollution and Section 10 regarding pollution prevention associated with construction works would apply equally in relation to limiting the likelihood of polluted surface water run-off being generated.	
	14. Unexploded Ordnance	If any unexploded ordnance was identified the following would occur: • Works would stop immediately, and the area evacuated and secured. • The police would be notified via the site Project Manager.	Principal Contractors and any sub-contractors
Post Construction	15. General	At the end of the project, the Principal Contractors will compile and produce an End of Project Environmental file as part of hand-over documentation. This file will contain all records of inspections, audits, registers, briefings and incidences.	Contractor Project Manager/ Environmental Manager.