

Timeframe	Topic	Mitigation Measures	Responsibility
During construction.	1. Air Quality and Emissions	<p>The principal sources of emissions during construction are construction traffic, and dust creation from construction activities.</p> <p>Best practice and mitigation procedures in place include:</p> <p>Site Management</p> <ul style="list-style-type: none"> ▪ All dust and air quality complaints should be recorded, and causes identified. Appropriate remedial action should be taken in a timely manner with a record kept of actions taken including of any additional measures put in-place to avoid reoccurrence; ▪ The complaints log should be made available to the local authority on request; and ▪ Any exceptional incidents that cause dust and/or air emissions, either on- or offsite should be recorded, and then the action taken to resolve the situation recorded in the logbook. <p>Monitoring</p> <ul style="list-style-type: none"> ▪ Daily on-site and off-site inspections should be undertaken, where receptors (including roads) are nearby to monitor dust. The inspection results should be recorded and made available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100m of site boundary, with cleaning to be provided if necessary; ▪ Regular site inspections to monitor compliance with the CMP should be carried out, inspection results recorded, and an inspection log made available to the local authority when asked; and ▪ The frequency of site inspections should be increased when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. <p>Preparing and Maintaining the Site</p> <ul style="list-style-type: none"> ▪ Plan the site layout so that machinery and dust causing activities are located away from receptors, as far as is practicable; ▪ Where practicable, erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site; ▪ Avoid site runoff of water or mud; 	Principal Contractors and any sub-contractors

		<ul style="list-style-type: none"> ▪ Keep site fencing, barriers and scaffolding clean using wet methods; ▪ Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover appropriately; and ▪ Where practicable, screen or cover stockpiles to prevent wind whipping. <p>Operating vehicle/machinery and sustainable travel</p> <ul style="list-style-type: none"> ▪ Ensure all vehicle operators switch off engines when stationary - no idling vehicles; ▪ Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable; ▪ A maximum-speed-limit of 15 mph on surfaced and work areas should be imposed; and ▪ A Delivery Routes Plan (CMP Appendix F) sets out the specified delivery routes for goods and materials to and from the Site, and is to be followed at all times. <p>Measures specific to construction</p> <ul style="list-style-type: none"> ▪ Avoid scabbling (roughening of concrete surfaces) if possible; ▪ Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place; and ▪ All construction plant and equipment should be maintained in good working order and not left running when not in use. 	
During construction.	2. Carbon	<p>The principal sources of carbon during construction are: embodied carbon of productions and materials, emissions from plant used during construction, and transport of products and materials to site.</p> <p>The following carbon reduction principles as detailed within Section 5.0 of the Carbon Assessment and Reduction Report (CMP Appendix D) will be considered by the Principal Contractor and all sub-contractors for the duration of construction of the scheme:</p> <ul style="list-style-type: none"> ▪ Design optimisation to reflect the carbon reduction hierarchy (detailed below and found in clause 6.1.4 of BSI (2016) PAS 2080); <ul style="list-style-type: none"> ○ Reduce the elements required for the Scheme; ○ Reduce the requirement for construction materials; ○ Substitute construction elements for lower-carbon alternatives (e.g. using low temperature asphalt); and 	Principal Contractors and any sub-contractors

		<ul style="list-style-type: none"> ○ Use efficient construction processes, such as design for manufacture and assembly. ▪ Works would be undertaken in line with the Site Waste Management Plan (CMP Appendix E); ▪ Maximise the use of locally sourced materials where available and practicable, to minimise the distance materials are transported from source to site; and ▪ Aspire to use suppliers and companies in the supply chain that are reviewing or reporting on their environmental, social and governance (ESG) ratings and certifications that enhance their sustainability performance. 	
During construction.	3. Climate Resilience	<p>Potential impacts on the Scheme due to climate change include: flooding of the site; waterlogging of site and excavations; moisture in materials and runoff from material piles; overheating, failure or disruption of machinery; health risks to site operatives; and disruption to the delivery of the Scheme.</p> <p>To reduce potential impacts due to climate change, the following measures would be implemented:</p> <ul style="list-style-type: none"> ▪ Adequate shade and PPE for workforce during periods of high temperatures; ▪ Securing and preventing access to scaffolding during strong winds or storms; ▪ Securing materials prior to storm events and strong winds; ▪ Ensuring lighting columns are secure; and ▪ Construction site drainage is clear and provisions able to withstand heavy rainfall events and prevent blockages. 	Principal Contractors and any sub-contractors
During construction.	4. Construction Materials, Sourcing, Management and Storage	<p>The following measures would be implemented by the Principal Contractor and any sub-contractors for the duration of construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ Ensure that the waste hierarchy is followed when dealing with waste on-site; ▪ All suppliers would be issued specific site routing arrangements in conjunction with the Delivery Routes Plan (CMP Appendix F) 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 Entrance and Site Canteen, indicating the Site Waste Management Storage areas. Consideration would be given to 	Principal Contractors and any sub-contractors

		<p>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;</p> <ul style="list-style-type: none"> ▪ Senior Site Manager would be appointed as the “waste champion” overseen by the Senior Project Managers; ▪ Waste would be separated if appropriate, 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; ▪ Ensure waste bins are appropriately sized and placed throughout the area ready for operation; and ▪ Local recovery routes for waste streams, recyclers and waste contractors to be finalised. 	
<p>During construction.</p>	<p>5. Ecology</p>	<p>The Site comprises bare ground (Hard standing), buildings, scattered scrub, tall ruderal, introduced shrub and scattered trees habitats. Overall, the Site was assessed as having limited ecological value. To limit disturbance to habitats and protected species, the following measures would be implemented by the Principal Contractor and all sub-contractors for the duration of construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ Good practice mitigation measures would be employed on-site, including waterbourne pollution prevention measures and dust and noise suppression measures; ▪ Where possible the vegetation should be maintained in its current state as it provides suitable habitat for a number of protected species, in particular nesting birds and potentially slow worm and common lizard; ▪ Any vegetation clearance affecting the scrub, trees or introduced shrub should be carried out outside of the breeding bird season (March to August inclusive). If it is not possible to do this, a nesting bird check must be carried out by a suitably qualified ecologist no more than 48 hours before the work is to take place; ▪ Contractors carrying out vegetation clearance should be briefed on the locations of existing fox dens and avoid trampling or tracking in that area. If further mammal holes are discovered, an ecologist should be contacted for advice; 	<p>Principal Contractors and any sub-contractors</p>

		<ul style="list-style-type: none"> ▪ All works should follow the industry standard construction best practice guidelines relating to ecology; ▪ The use of the existing lighting on site should be carefully considered to avoid light spill onto vegetative habitats, where possible; and ▪ Should any further protected and/or notable species are encountered during the works, all activities should cease, and a professional ecologist contacted for advice. 	
During construction.	6. Housekeeping	<p>To reduce the likelihood of an environmental incident or nuisance occurring, the following measure would be implemented for the duration of the construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ 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 15 of this non-technical summary table. ▪ Measures to minimise Noise and air quality emissions would be implemented in line with Sections 9 and 1 of this non-technical summary table; ▪ 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; and ▪ A construction worker travel plan would be implemented to encourage use of public transport by site staff and control off-site parking. 	Principal Contractors and any sub-contractors
During construction.	7. Landscape and Visual	<p>The principal sources of potential effects on visual intrusion and landscape character during construction are: 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; and lighting disturbance caused by temporary lighting during construction.</p> <p>The following measures may be considered during the construction works:</p>	Principal Contractors and any sub-contractors

		<ul style="list-style-type: none"> ▪ Use of attractive hoardings to screen low-level ‘clutter’; ▪ Appropriate location, organisation, and phasing of construction activities (further details can be found in the Construction Logistics Plan); ▪ Tidy Site management to reduce the visual clutter associated with building works; ▪ Large plant will be located away from the most sensitive receptors, where there are viable alternative locations; ▪ Temporary construction lighting to be minimal in extent and use. The lighting is to be highly directional and seek to minimise light spill and glare into the surrounding landscape. Construction operations to be limited to daylight working hours where possible; and ▪ Noise and dust to be kept to a minimum. 	
During construction.	8. Lighting	<p>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.</p> <p>The following measures would be implemented for the duration of the construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ Lighting would be at the minimum luminosity necessary and use low-energy-consumption fittings; ▪ Where appropriate, lighting would be activated by motion sensors to prevent unnecessary usage; ▪ Lighting would comply with the Institute of Lighting Professionals’ <i>Guidance notes for the reduction of obtrusive light</i>; ▪ Lighting would be designed, positioned and directed so as not to unnecessarily intrude on any adjacent buildings; ▪ Lighting would be directed downwards where possible to minimise light intrusion for adjacent buildings; and ▪ The use of infrared initiated security lighting to minimise night-time lighting shall be explored 	Principal Contractors and any sub-contractors
During construction.	9. Noise and Vibration Management	<p>The closest NSRs to the Scheme are located to the south of the Site on Melbourne Avenue. The Dover Christ Church Academy school is located on the south-western boundary of the Site. There are residential properties beyond the school. The area to the east is predominantly agricultural land, with the proposed Dover Inland Border Facility beyond.</p>	Principal Contractors and any sub-contractors

The following noise limits at the closest receptors are recommended in order to minimise the risk of noise impacts during construction:

- Daytime 65 dB LAeq, T (08:00 – 18:00 weekdays and 08:00 – 13:00 Saturdays)
- Evenings 55 dB LAeq, T (18:00 – 23:00 weekdays, 13:00 – 23:00 Saturdays, 08:00–23:00 Sundays)
- Night 45 dB LAeq, T (23.00 – 08:00)

The Principal Contractor will apply best practice measures (BPM) as defined under Section 72 of the CoPA to minimise noise. Such measures include:

- contact details for nominated site contact for local residents to deal with complaints and engaging with local residents;
- selection of quiet and low noise equipment and methodologies;
- optimal location of equipment on site to minimise noise disturbance;
- the provision of acoustic enclosures around static plant, where necessary;
- use of less intrusive alarms, such as broadband vehicle reversing warnings;
- compliance with permitted working hours, as recommended by DDC, of 08:00-18:00 Monday-Friday and 08:00-13:00 Saturday for the majority of the works;
- where works involving noise generating activities are required to be undertaken outside of permitted working hours, a Section 61 application will be made to DCC;
- 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 could exceed these limits, prior agreement would be sought with Dover Council;
- 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;
- 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 warning systems (e.g., white noise alarms);

		<ul style="list-style-type: none"> ▪ Train and advise members of the construction 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; ▪ 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 (including materials delivery); and ▪ Where it has been identified that there would be noise levels above the lower exposure action value of 80 dB(A) LEP,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) LEP,d an exclusion zone would be established that can only be entered by persons wearing adequate hearing protection. <p>The Principal Contractor will apply BPM as defined under Section 72 of the CoPA to minimise vibration. Such measures include:</p> <ul style="list-style-type: none"> ▪ no piling will take place; ▪ selection of quiet and low vibratory equipment and methodologies; and ▪ contact details for nominated site contact for local residents to deal with complaints and engaging with local residents. 	
<p>During construction.</p>	<p>10. Pollution Prevention and Control</p>	<p>To reduce the likelihood of an environmental incident or nuisance occurring, the following measure will be implemented by the Principal Contractor and all sub-contractors for the duration of the construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ 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; 	<p>Principal Contractors and any sub-contractors</p>

- 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 bowzers;
- Plant nappies 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 keep a record of all spillage incidents and inform the nominated undertaker of any spills which cause land contamination or pollution off-site;
- By preference, connection to the local foul sewer system as agreed with the relevant local authorities;
- Containment by temporary foul drainage facilities and disposal off-site by a licensed contractor;
- Any foul drainage discharge to the public sewer would require approval from the statutory water undertaker. 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 an appropriate disposal facility.
- 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);

		<ul style="list-style-type: none"> ▪ Ensure staff competence and awareness in implementing plans and using pollution response kit; ▪ Any stockpiled materials to be stored within enclosed areas to enable the run-off to be stored and treated where required; and ▪ All plant and machinery to be maintained in a good condition and any maintenance required would be undertaken within safe areas. <p>Reporting Pollution Incidents</p> <p>An Emergency Response Plan and Environmental Incident Register will be developed and maintained by the project management staff, Principal Contractor, Health and Safety Manager, and Environmental Manager to highlight the potential pollution receptors specific to each works area and the activities taking place there.</p> <p>In the event of a spill or leak, the emergency spill response procedure will be followed. All incidents will be recorded on an Environmental Incident Register.</p>	
During construction.	11. Population and Health	<p>To reduce the impacts on population and human health, the following measures will be implemented for the duration of the construction of the Scheme:</p> <ul style="list-style-type: none"> ▪ Contractors will act considerately in relation to local residents ▪ Access to commercial properties should be retained throughout the construction period, including access to White Cliffs Business Park. ▪ Best practice construction methods should be used to minimise noise levels. <p>The acceptable working limits in relation to noise (Section 9 of this non-technical summary table) and air quality (Section 1 of this non-technical summary table) would be monitored in the event of a complaint.</p>	Principal Contractors and any sub-contractors
During construction.	12. Traffic Management	<p>Works are to be carried out in accordance with a Delivery Routes Plan (CMP Appendix F) produced by the contractor. The routing diagram will be used in reverse for vehicles exiting the Site. The Site is designed to allow construction site vehicles to enter and exit in a forward gear. It is understood that construction staffing numbers will be significantly less than those during operation.</p> <p>The following measure would be implemented by the Principal Contractor and all sub-contractors for the duration of the construction of the scheme:</p>	Principal Contractors and any sub-contractors

		<ul style="list-style-type: none"> ▪ 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 goods vehicle movements are controlled on-site by marshalling; ▪ Ensure local community are informed of the proposals; ▪ All practical measures would be put in place to avoid / limit and mitigate the deposition of debris on the highway, these would include: <ul style="list-style-type: none"> ○ Hardstanding at the access and egress points would be cleaned at appropriate intervals; ○ The correct loading of vehicles and sheeting of loads where necessary to avoid spillage during their journeys; ○ 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; and ○ The flushing of gullies in the vicinity of the site. 	
During construction.	13. Waste Management	<p>Due to the scale of the Scheme, it is expected that construction will generate minimal waste. Materials would be required for the construction of the modular buildings, fencing and new access. Waste materials would likely be generated from the removal of vegetation, general internal building works and maintenance works.</p> <p>The following measures would be implemented for the duration of the construction of the Scheme:</p> <p>Minimisation of Waste</p>	Principal Contractors and any sub-contractors

The Principal Contractor 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

Identification and Classification of Waste

- A Site Waste Management Plan (SWMP) has been prepared (CMP Appendix E) and would be maintained by the Principal Contractor
- 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

- 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.
- 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.
- 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 non-technical summary table.

		<ul style="list-style-type: none"> ▪ 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 <p>Duty of Care Requirements and Authorisations</p> <ul style="list-style-type: none"> ▪ The Principal Contractor 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 	
During construction.	14. Water Management	<p>There are no watercourses located within 500m of the site. The nearest watercourse to the site is indicated to be the River Dour located approximately 1.5km to the south of the site. The site is located towards the top of a natural ridge that falls towards the north and is therefore not indicated to be located within the natural drainage catchment of the River Dour.</p> <p>Measures to be implemented to limit the impact of construction activities on the water environment include:</p> <ul style="list-style-type: none"> ▪ All construction workers to be briefed on the use of spill kits as part of the site induction ▪ 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. ▪ Approval from the relevant regulatory body would be sought for plans of work likely to affect any surface or groundwater resource. 	Principal Contractors and any sub-contractors

		<ul style="list-style-type: none"> ▪ 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. ▪ Installation of sufficiently sized kerbs to prevent runoff from vegetation from entering the ground. ▪ 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. ▪ 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. ▪ A risk-based precautionary approach using the ‘source-pathway-receptor’ concept would be applied to temporary and permanent works. 	
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.