South Brooks Solar Farm

Preliminary Environmental Information
Volume 2: Outline Construction Environmental Management Plan

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Blue Planet Solar Limited

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1 Introduction

1.1 Purpose of this Document

1.1.1 This outline Construction Environmental Management Plan (oCEMP) has been prepared for the purposes of Phase Two Consultation. A full oCEMP will be produced and submitted as part of the DCO submission. This document has been produced on behalf of the Applicant to detail management methods to ensure that potential impacts on the environment during construction will be mitigated, in relation to the Development Consent Order (DCO) application for the construction, operation and decommissioning of South Brooks Solar Farm (the 'Project').

1.1.2 A Detailed CEMP will be produced for the Project and approved by the relevant planning authority prior to the commencement of the construction phase. It will be a requirement of the DCO that the detailed CEMP would be consistent with the oCEMP. This draft iteration of the oCEMP therefore sets out the likely structure and the measures that will be included within the oCEMP which will be submitted as part of the DCO application, and subsequently the detailed CEMP, to deliver the construction phase of the Project. Therefore, the core purpose of this document is to present initial proposed mitigation measures and structure for feedback as part of Phase Two Consultation.

1.1.3 Updates to the detailed CEMP will be undertaken to align with construction works and environmental conditions, to ensure the document remains relevant and effective. The detailed CEMP to be submitted (should the DCO application be granted consent) will be prepared following the appointment of a Principal Contractor, prior to the start of construction of the Project.

1.1.4 This document does not address proposed mitigation measures for the operational and decommissioning phases, which would be provided in the separate outline Operational Environmental Management Plan (oOEMP) and the outline Decommissioning Environmental Management Plan (oDEMP) respectively, and submitted as part of the DCO application. Section 3.2.4-3.2.5 of Volume Two of the PEI details the wider work and rationale undertaken at this stage regarding management plans.

1.1.5 Likely significant environmental effects would be identified and assessed through the Environmental Impact Assessment (EIA) process and would be reported in the Environmental Statement (ES) as part of the DCO application. At this stage of the Project, early environmental assessment work is presented as part of the Preliminary Environmental Information (PEI) Volumes 1 and 2. A range of best practice mitigation and construction methodology measures would be accounted for in the assessments, and these would be implemented during construction of the Project. This oCEMP provides early information on how these measures will be implemented. It also sets out the potential monitoring activities developed to ensure that mitigation measures are carried out, and that they are effective.

1.1.6 This oCEMP has been prepared with the objective of compliance with the relevant legislation and mitigation measures identified through the EIA process. Any additional construction licences, permits or approvals that are required for the construction phase of the Project, will be set out in the detailed CEMP, including any environmental information submitted in respect of them.

1.1.7 The appointed Principal Contractor will be responsible for working in accordance with the environmental controls documented in any approved detailed CEMP(s). The overall responsibility for implementation of the detailed CEMP(s) will lie with the appointed Principal Contractor as a contractual responsibility to the Applicant.

1.2 The Project

1.2.1 The Project comprises the construction, operation and decommissioning of a solar photovoltaic (PV) array electricity generating facility across approximately 1,225 hectares (ha) of land (the 'Site'), with approximately 1,174ha of the Site located within Kent and approximately 50ha in East Sussex. The Project includes solar PV arrays, onsite substation(s), Battery Energy Storage System (BESS) units, power conversion stations, grid connection infrastructure (including underground grid connection cabling to the Point of Connection (PoC) and underground interconnecting cable routes), access tracks, as well as specific landscape and ecological mitigation and enhancement areas across Project parcels. The Project would allow import and export of up to 500 megawatts (MW) of electricity to the Dungeness Substation (PoC), which distributes the electricity to the National Grid.

1.2.2 The proposed location of the Project is shown below in Figure 1-1. Further details are provided within Volume One with regard to the Project description and Site evolution, and Volume and Two of the PEI with regard to the technical impact assessments.

Figure 1-1: Project Location Plan

2 Construction Environmental Management

2.1 Introduction

2.1.1 As part of this early iteration of the oCEMP, the following construction environmental management measures are presented as indicative at this stage of the Project. This section includes an outline of the potential roles and responsibilities required, the programme of works and associated activities, best practice measures, traffic management and site maintenance. Following feedback received during the Phase Two Consultation and ongoing engagement with stakeholders, further details will be developed alongside Project design updates, which will be formulated into the oCEMP to be submitted as part of the DCO application.

2.2 Roles and Responsibilities

2.2.1 The Principal Contractor to be appointed to the Project would make available sufficient time and resource for the effective management of environmental risks that could arise during construction work. This includes appointing adequately qualified personnel with knowledge and capability in the environmental management of construction site works. Persons having responsibility for environmental site management, and in particular any persons required to undertake and oversee response to any incidents with potential environmental consequences, would be able to make decisions and take appropriate action necessary to avoid or mitigate adverse environmental effects, even when this may lead to delay and/or additional cost to the Principal Contractor.

2.2.2 The Applicant and all appointed contractors would be responsible for ensuring that the potential risks to the environment are adequately avoided or controlled by the measures as documented within the detailed CEMP, which shall be complied with throughout construction. The key roles and responsibilities during the construction phase in managing environmental impacts would likely include, but are not limited to:

- Project Director – responsible for overarching team resources, staff and training;
- Project Manager – responsible for project delivery in accordance with the detailed CEMP;
- Site Manager – overall responsibility of on-site activity;
- Construction Project Manager – responsible for the implementation of the DCO, detailed CEMP and other environmental, legal requirements, including reporting;
- Environmental Manager – ensures environmental legislation and practices are complied with, environmental monitoring, incident response and liaison with authorities and environmental bodies;
- Ecological Specialist – responsible for advice on ecological matters and the overseeing of construction activities, mitigation measures and monitoring. Ensures the minimisation of impacts to protected species and habitats;
- Health and Safety Manager – responsible for health and safety compliance; and
- Community Liaison Officer – responsible for leading local discussions with the community and act as a single point of contact.

2.2.3 These roles and responsibilities are indicative at this stage, with further detail to be provided as part of the oCEMP as part of the DCO application and would be confirmed as part of the detailed CEMP.

2.3 Construction Programme

2.3.1 The construction phase is anticipated to occur over a period of up to 48 months. Further detail will be provided as part of the oCEMP, and subsequent final programme details would be included within the detailed CEMP.

2.4 Construction Activities

2.4.1 The Project is described in Section 1.2 above, to which construction activities would be divided into work packages. At this stage of the Project, work packages and the associated work numbers, are at an early stage of development and are therefore subject to further change. Indicatively, the following work stages are outlined below:

- A ground-mounted Solar PV development of over 100 MW including;
    - Ground-mounted Solar PV generating station. The generating station will include Solar PV modules and mounting structures;
    - Balance of Solar System (BoSS), which comprises inverters, transformers, and switchgear;
- Battery Energy Storage System (BESS) compound, including batteries and associated inverters, transformers, switchgear and ancillary equipment and their containers, civils works and drainage, enclosures, monitoring systems, air conditioning, electrical cables, fire safety infrastructure and operation, maintenance, security, and welfare facilities;
- Satellite Collector Compounds comprising switchgear, transformers, ancillary equipment and operation, maintenance, security, and welfare units;
- The South Brooks substation compound, which would include the substation, main collector compound, switching and control equipment, office/control/welfare/security buildings, storage areas, and provisions for vehicular parking and material laydown;
- 400kV Grid Connection Corridor to connect the South Brooks substation(s) to the PoC into the National Grid Dungeness Substation;
- interconnecting cabling would connect the Solar PV modules and BESS compound to the BoSS, collector compounds, and the South Brooks substation(s);
- Ancillary infrastructure works, including boundary treatments, security equipment, earthing devices, fencing, lighting, earthworks, surface water management, internal tracks and any other works identified as necessary to enable the development;
- Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
- Works to facilitate vehicular access to the Site.

2.4.2 The oCEMP will provide further information on how the draft DCO allows for certain works to occur in connection and in addition to the work packages set out above, within the Site boundary (which will be referred to as the Order Limits at that stage) for construction activities which could include items such as fencing, drainage works, CCTV, as well as landscape and ecological mitigation measures.

Potential permitted preliminary works

2.4.3 Permitted preliminary works are clearly defined, preparatory works associated with the Project which can be undertaken without first having to discharge various requirements in the DCO related to construction phase. At this stage, no firm decision has yet been made as to whether there would be a need for any permitted preliminary works and what their scope would be. The following activities are presented as potential permitted preliminary works at this stage:

- environmental surveys, geotechnical surveys, intrusive archaeological surveys and other investigations for the purpose of assessing ground conditions;
- removal of plant and machinery;
- above ground site preparation for temporary facilities for the use of contractors;
- remedial work in respect of any contamination or other adverse ground conditions;
- diversion of existing services and the laying of temporary services;
- the provision of temporary means of enclosure and site security for construction;
- the temporary display of site notices or advertisements; or
- site clearance (including vegetation removal, demolition of existing structures or buildings).

Construction activities

2.4.4 The construction activities would be undertaken in accordance with any approved detailed CEMP, which must be in substantial accordance with the principles set out within the oCEMP to be submitted as part of the DCO application, and which would be prepared prior to the commencement of the construction activities. The indicative construction activities that would be required comprise (not necessarily in order):

- Site preparation, including minor localised site levelling, vegetation clearance, landscape planting and establishment of perimeter fencing and security measures;
- Import of construction materials, plant, and equipment to Site;
- Establishment of Site construction compounds and welfare facilities;
- Appropriate storage and capping of soil;
- Management of waste;
- Establishment of drainage systems;
- Site access works and construction of new Site tracks and points of access from the public highway;
- Installation of bridges and culverts across watercourses and ditches;
- Off-site highway works;
- Trenching in sections;
- Installation of Horizontal Directional Drilling (HDD) launch and reception compounds and drilling of HDD crossings;

- Testing and commissioning; and
- Site reinstatement (i.e., returning any land used during construction for temporary purposes to its previous condition).

2.5 Cabling

2.5.1 At this stage of the Project, indicative details are available with regard to cabling, which will be developed further in subsequent details submitted as part of the DCO application.

2.5.2 With regard to working widths for proposed cabling, up to 30m may be required to allow for cable trenches, construction access as well as soil and subsoil storage. Further details on cabling are provided in Volume Two of the PEI. Greater widths may be needed in limited locations to allow for multiple Horizontal Directional Drilling (HDD) cable crossings under sensitive receptors including railway lines, roads and watercourses. At this stage, further work is required to determine precise working widths for different types of substrate. This will be detailed within the oCEMP to be submitted as part of the DCO application.

2.5.3 Cable trench dimensions for the connection between the Project and the point of connection into the National Grid Dungeness Substation would be expected to be up to 2m wide and approximately 1.5m in depth in soil. With regard to shingle, width at the top of the trench may be up to 6m to allow for sloping sides during installation to ensure stability. Low voltage cable trenches would be up to 2m wide and up to 2m deep, and are generally for connecting PV modules to inverters and inverters to transformers within PV array fields. 33kV cable trenches may be up to 15m wide (individual trenches, in some locations there may be a need for more than one trench) and up to 1.5m deep.

2.6 Working Hours

2.6.1 The normal (or core) hours of working on any part of the Project during the construction period will be provisionally set out in the oCEMP as part of the DCO application and is subject to agreement from Local Planning Authorities (LPA).

2.6.2 At this stage, it is provisionally expected that core working hours would be between 7am and 7pm Monday-Friday, 7am-noon on Saturdays, with no working on Sundays and bank holidays without prior permission from the LPA. Limited overnight working may be required where operations cannot be paused, for example completion of HDD works.

2.7 Site Set Up and Compounds

2.7.1 The precise number and location of compounds will be determined as part of the oCEMP to be submitted as part of the DCO application. Details provided below are indicative at this stage.

2.7.2 During the construction phase, there would be three Primary Construction Compounds (typically the larger, main hubs for major construction logistics and project management) which would be provided on Site, as well as up to six Secondary Construction Compounds (typically the smaller, localised facilities located closer to specific work areas) that would be provided at different locations within the Site. The indicative locations of the Primary and Secondary Construction Compounds at this stage are identified in Figure 2-1 below.

2.7.3 The indicative footprint of Primary Construction Compound is up to 25,000m^2. Each Secondary Construction Compound would be up to 1,250m^2 in size.

2.7.4 Each Primary Construction Compound would be located at or as close to access points and tracks as practicable within the Site to minimise the extent of ground disturbance.

2.7.5 A dedicated construction car park would be located within and/or adjacent to each Primary Construction Compound with some parking, where required, at Secondary Construction Compounds.

2.7.6 Potential activities occurring within the Primary and Secondary Construction Compounds include the following:

- areas of hardstanding with haul road areas comprising stone laid on a geotextile membrane;
- car and cycle parking;
- site and welfare offices and facilities, canteens, and workshops;
- area to store materials, plant, and equipment;
- storage and waste skips;
- area for download and turning for deliveries;
- security infrastructure, including cameras, perimeter fencing, security gatehouse(s) and lighting;
- site drainage and waste management infrastructure (including sewerage); and
- electricity, water, wastewater, and telecommunications connections.

2.7.7 Towards the end of the Project's construction phase, the temporary Primary and Secondary Construction Compounds would be removed, and these locations could be utilised for other development as detailed in the current Project masterplan.

2.7.8 The set up, layout and use of compounds would be confirmed by the Principal Contractor with further details described in the detailed CEMP(s).

2.8 Site Security

2.8.1 Site security during construction would be managed by the Principal Contractor. The Site security fencing would remain in place throughout the duration of the construction period. Any storage of materials would be kept secure to prevent theft or vandalism. A safe storage system for accessing the materials storage areas would be implemented by the Principal Contractor.

2.8.2 Site security and fencing to be installed during the construction phase will be confirmed by the Principal Contractor and included in the detailed CEMP.

2.9 Control of Light

2.9.1 Construction lighting would be required for Health and Safety and Security around Site access points, as well as construction and welfare compounds. The mitigation principles would be adopted to avoid excessive glare and minimise spill of light to nearby receptors (including ecological and residential)

outside of the Project as far as reasonably practicable. Any lighting during the construction phase would be directional, temporary and only used during working hours. There would be no permanent (continuous) lighting for security purposes, except where necessary to take account of health and safety requirements and emergency exits.

2.9.2 Specification and quantities are not defined at this stage of the Project, and further detail will be provided as part of the updated oCEMP for DCO submission and would be finalised as part of the detailed CEMP.

2.10 Control of Noise

2.10.1 Working hours to be formally agreed at a later stage of the Project, noisier activities would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. The oCEMP will identify specific receptors that would be impacted by construction works.

2.10.2 Thresholds for construction-related noise will be identified for nearby sensitive receptors and presented as part of the Noise and Vibration chapter of the Environmental Statement (ES), and the applicable noise thresholds will be defined in the detailed CEMP. Thus, where onsite works are to be conducted outside of the core working hours, they would comply with any restrictions agreed with the relevant planning authority and reflected in the detailed CEMP, in particular regarding the control of noise and traffic. Compliance with these noise limits would ensure that significant adverse effects are unlikely. Abnormal (vehicles that exceed standard limits for width, length or weight) or emergency construction traffic movements may occur outside of normal working hours. In the event of these occurrences, specific noise mitigation measures would be put in place to reduce potential noise impacts at nearby noise sensitive receptors.

2.11 Construction Traffic Management and Access Routes

2.11.1 During construction, the appointed contractor(s) would ensure that the impacts from construction traffic on the local community (including residents and businesses and users of the surrounding transport network) are reduced, where reasonably practicable by implementing the measures set out in an outline Construction Traffic Management Plan (oCTMP) to be submitted as part of the DCO application.

2.11.2 An early iteration of the oCTMP has been drafted as part of Phase Two Consultation for the Project and sets out the framework through which the detailed CTMP would be prepared, which in turn details how traffic measures for the management of construction traffic would be implemented as part of the Project.

2.11.3 A detailed CTMP would be required to be produced by the contractor(s) and agreed with the relevant highways authorities prior to the commencement of construction activities.

2.11.4 The principal contractor would implement measures to control and mitigate and dust tracking onto the highway, including vehicle wheel cleaning. Additionally, a road sweeper would be deployed when required, to remove any mud and dust that has tracked onto the highway.

2.12 Construction Waste Management

2.12.1 Prior to construction works commencing, a Site Waste Management Plan (SWMP) would be prepared by the contractor which would identify waste streams, plan appropriate arrangements and procedures accordingly, ensure legal requirements are identified and complied with and identify opportunities for waste minimisation and sustainable material use.

2.12.2 The SWMP would be based on the Outline Site Waste Management Plan (oSWMP) which will be submitted as part of the DCO application, and will be finalised with specific measures to be implemented prior to the start of construction.

2.12.3 All waste to be removed from the Site boundary would be undertaken by fully licensed waste carriers and taken to licensed waste facilities. The waste hierarchy will be applied, in priority order: prevention, preparation for reuse, recycled, other recovery and disposal.

2.13 Environmental Incidents and Emergencies

2.13.1 An Emergency Response Plan and Flood Management and Evacuation Plan would be developed in consultation with the relevant local authority emergency planning officer, emergency services including Kent Fire and Rescue Service, Lead Local Flood authority (LLFA), as well as the Environment Agency, in relation to responding to flood warnings, fire events and other emergency events.

2.13.2 The plan would also detail the procedures for responding to incidents (such as spills, leaks or generation of silt laden runoff as to prevent pollution) and emergencies (such as flooding) onsite, and any reporting. This would also include the arrangements for all incidents, including environment incidents, and would include the procedures for the immediate response, reporting, permitting requirements, stakeholder communications, and incident investigation.

2.13.3 Battery Energy Storage Systems (BESS) is proposed as part of the Project. To effectively manage potential environmental incidents and emergencies specific to BESS, an outline Battery Safety Management Plan (oBSMP) will be developed and submitted as part of the DCO application. This management plan will detail measures to ensure the safe construction, operation, and decommissioning of the BESS. The oBSMP will outline key safety provisions in the event of a very rare thermal runaway emergency event, including fire risk reduction measures, fire protection systems, and emergency response planning, emphasising adherence to industry best practice. The oBSMP would also inform the Emergency Response Plan and Flood Management and Evacuation Plan.

2.14 Watercourse crossings

2.14.1 All watercourse crossings would be either bridges or a culvert of appropriate size to convey flood flows. Any temporary structures will be removed with the watercourse reinstated.

2.14.2 Cable crossing depths would take account of potential deepening of watercourse channels over the lifetime of the Project.

2.15 Protection of Below Ground Utilities

2.15.1 Utilities data has been gathered at this stage of the Project. Information has been provided to date with regard to the location of utilities, which has been fed into Project optioneering and ongoing engagement discussions. Going forward, further engagement would be undertaken prior to commencement of construction activities to identify any further utilities works and agree safe methods of working with each utility provider.

2.15.2 Offsets, if required, around major utilities will be implemented, as agreed with each utility owner, to avoid impacts.

2.16 Unexploded Ordnance (UXO)

2.16.1 A preliminary UXO desk study and risk assessment has been undertaken as part of the Project at this stage and has identified potential hazards from Unexploded Bombs (UXBs) and Unexploded Anti-Aircraft (UXAA) shells, which is typical in this part of the United Kingdom (UK).

2.16.2 The oCEMP will provide further detail and specific measures following the completion of further detailed surveys on the Site. Measures that are likely to be included as part of the oCEMP and finalised as part of the detailed CEMP, include the provision of a non-intrusive UXO survey in advance of intrusive works in relevant areas, as well as deep UXB detection during intrusive works, and also the provision for UXO awareness briefings for all site staff. If necessary, the risk of UXO would be managed by the implementation of a UXO Risk Management Plan for intrusive works and site-specific awareness briefings, alongside attendance by a UXO specialist and onsite support for intrusive works in areas of risk.

2.17 Site Maintenance

2.17.1 The Site should be tidy, secure, and have clear access routes that are well signposted. The appearance of a tidy, well-managed site can reduce the likelihood of theft, vandalism, complaints and/or specific hazards that could affect the safe operation of the other businesses in the area, such as wind-blown litter.

2.17.2 In terms of Site maintenance, relevant guidance will be adhered to including the Construction Industry Research and Information Association (CIRIA) 'environmental good practice on site guide' which recommends the following measures to be implemented as part of the oCEMP:

- Adequately plan the Site with designated areas of materials and waste storage;
- Segregate and label different types of waste as it is produced and arrange frequent removal;
- Keep the Site tidy and clean;
- Ensure that no wind-blown litter or debris leaves the site, use covered skips to prevent wind-blown litter;
- Keep hoarding tidy – repair and repaint when necessary, removing any fly posting or graffiti;
- Frequently brush-clean wheel washing facilities and keep haul routes clean from site derived materials;
- Keep roads free from mud by using a road sweeper; and
- Ensure the Site is secure.

2.18 Best Practice Measures

2.18.1 The Considerate Constructors Scheme (CCS) would be adopted to assist in reducing pollution and nuisance from the Project, by employing good practice measures which go beyond statutory compliance.

2.19 Community Liaison and External Communication

2.19.1 A Community Liaison Group (CLG) (including a Community Liaison Officer(s)) would be established for the duration of the construction period.

2.19.2 Prior to the commencement of the construction phase, the Applicant would submit to the relevant planning authority for approval the terms of reference for a Community Liaison Group whose aim is to facilitate liaison between representatives of people living in the vicinity of the Site boundary and other relevant organisations in relation to the construction of the Project.

2.19.3 Any complaints would be directed toward the Community Liaison Lead, who will ensure that all necessary action/ investigation is undertaken.

3 Construction Environmental Management and Mitigation Procedures

3.1 Topic-specific mitigation

3.1.1 As part of the oCEMP, at the time of submission of the DCO Application, this oCEMP will include a table summarising the mitigation and management measures to be included as part of the detailed CEMP. This table will be informed by the Environmental Statement and other relevant documentation. This is also important with regard to the proposed monitoring where relevant which assesses the effectiveness of the measures to be put in place.

3.1.2 At this stage, an early indication of what this information will contain, has been provided below in relation to each relevant environmental discipline. This information is not exhaustive and is subject to further change as the Project develops and further environmental information becomes available.

Air Quality

3.1.3 With regard to air quality, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- restricting vehicle movements near sensitive habitats and residential properties, and implementing best-practice dust control measures into the design;
- embedding controls such as a 'no-idling' policy and 'emissions-compliant' plant to ensure emissions are controlled at the source; and
- implementing a communications strategy with relevant personnel to ensure accountability for air quality and dust issues during construction.

3.1.4 The draft oCEMP will be updated to reflect the findings of the air quality assessment as well as feedback received during ongoing consultation.

Biodiversity

3.1.5 With regard to biodiversity, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- The integration of a suitably qualified ecologist appointed during construction to advise on protecting important biodiversity features and provide advice on how to achieve compliance with environmental legislation, including disturbance. Relevant site staff would receive toolbox talks on the ecological risks present, legal requirements and working arrangements necessary to comply with legislation. Toolbox talks would be repeated as necessary over the duration of the relevant works;
- Pre-construction surveys would be required to identify any new constraints and to identify the requirement for protected species licensing;
- Legally Protected Species Protection Plans could be produced, as appropriate, by the ecologist in conjunction with the Principal Contractor if required, based on pre-construction surveys;
- In the event that a protected species is found to be a constraint during the pre-construction surveys, and if a protected species licence is deemed to be required by the ecologist, then a licence application would be submitted to Natural England;

- Any hedgerow sections that require removal would be reinstated in the same location where practicable;
- With regard to Great Crested Newts, works with the potential to affect GCN would be carried out either under a European Protected Species licence from Natural England or a District Level License (DLL);
- With regard to reptiles, any vegetation clearance or ground clearance proposed within areas of habitat suitable for reptiles will be supervised by a suitably qualified ecologist. In sensitive areas, this clearance could be completed in phases so as to cut down to a certain length, before a walkover search is completed, to then subsequently cut to a final height;
- With regard to otter and water vole, pre-construction surveys will be conducted to search for signs of otter and water vole within, or adjacent to the Site boundary, and otter and water vole presence will be monitored during the period of operation. Appropriate buffer zones would be put in place if holt/couch is found for otter, and burrows/nest for water vole;
- With regard to ground nesting birds, non-ground nesting birds and wintering birds, appropriate pre-construction nesting bird surveys will be undertaken. A suitably qualified ecologist will supervise all work during the nesting bird season and ensure appropriate measures are undertaken to prevent disturbance, injury and/or death to ground nesting and non-ground nesting birds. Any vegetation clearance or ground clearance proposed within the nesting bird period (March to August inclusive) would be checked for the presence of any nests by a suitably experienced ecologist within 48 hours prior to vegetation removal or ground clearance. If active nests are found, appropriate buffer zones will be put in place and the area monitored until the young birds have fledged;
- With regard to badgers, pre-construction badger surveys would be undertaken to confirm status of existing badger setts and to identify the presence of any new setts with appropriate buffers maintained to prevent disturbance or damage to setts. In the unlikely event that a sett cannot be avoided, then sett closure would be considered under the appropriate licensing regime;
- Biosecurity procedures such as wheel washing and check, clean, dry procedures would be followed to ensure that no invasive species are brought onto the Site. In the event that any invasive non-native species are identified prior to and/or during construction, exclusion zones would be established and the suitably qualified ecologist contacted for advice as required; and
- A site-specific Arboricultural Method Statement (AMS) will be compiled, detailing the exact location and nature of protective fencing, tree pruning, signage, timings and methods of works and other protection measures. All site operatives would be made aware of the nature of the protection detailed in the AMS and it should remain in place throughout construction.

Hydrology

3.1.6 With regard to hydrology, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- No vehicle, equipment or material storage would be permitted within 20m of watercourses, where practicable, and except where crossings are needed;
- The placement of stockpiled materials as far away as practically possible from sensitive receptors;

- Vegetation removal would be undertaken on a phase-by-phase basis to avoid excessive exposure of bare soil. Silt fencing or straw bales to be placed downslope of construction works to prevent silt entering watercourses;
- A wheel wash at the Site access could be implemented to reduce silt migration across the Site;
- Vehicles could be inspected at the start of each day, and vehicles showing signs of fuel/oil drips, missing fuel caps, or damaged hydraulics would be rejected and not used on Site before repair;
- Emergency spill kits would be available on site to react quickly and stop contamination to sensitive receptors should plant leak; and
- A temporary drainage strategy would be implemented during construction works to control runoff rates and sediment mobilisation. A Flood Management and Evacuation Plan would be produced prior to the construction phase commencing for any areas of the Proposed Development (mainly Internal Access Corridors and Solar PV modules) that intersect areas of flood risk.

Landscape and Visual

3.1.7 With regard to landscape and visual, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- Ensuring that construction would be undertaken in a sensitive manner with regard to the existing landscape fabric within the Site, including considerate placement of construction compounds. All existing vegetation would be retained and protected during construction where possible, except where removal is indicated on the vegetation removal plans which would be finalised as part of the outline Landscape and Ecology Management Plan (oLEMP); and
- Ensure that construction compounds are maintained in a neat and tidy appearance.

3.1.8 Further details regarding landscape and visual will be detailed as part of the oLEMP submitted as part of the DCO application, to which an early draft is presented as part of Phase Two Consultation.

Land and Groundwater

3.1.9 With regard to land and groundwater, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- Minimise the use of concrete, trenches and foundations;
- Measures to contain any BESS firewater to prevent contamination into groundwater;
- Procedures to avoid harm to human health due to contamination, and to avoid, reduce or mitigate effects on the environment during construction works. This includes managing risks from former agricultural activities such as foot and mouth burial pits, waste pits, pesticides and asbestos containing material, ensuring that land and groundwater receptors are protected from effects of contamination associated with historical usage of the land;
- Good housekeeping and site maintenance, including management of materials and waste;
- Maintain records relating to routine inspections, investigations, corrective actions and action schedules;

- Storage of topsoil within bunds and seeded for periods greater than six months; and
- The timing of works would be managed carefully to consider weather conditions, particularly heavy and persistent rain to minimise vehicles travelling across the Site when soil conditions are wet.

Noise and Vibration

3.1.10 With regard to noise and vibration, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- Use of equipment with low noise emissions, where feasible;
- Orientating noise emitting equipment to reduce noise level beyond the Site boundary;
- Where practicable, temporary enclosures would be used to screen all static or semi-static plant from noise sensitive receptor locations;
- All plant, equipment and noise control measures applied to plant and equipment to be maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable; and
- Any plant, equipment or items fitted with noise control equipment found to be defective will not be operated until repaired.

Cultural Heritage

3.1.11 With regard to cultural heritage, best practice mitigation would be used to minimise dust and noise from activities and vehicles that might impact on cultural heritage assets. These measures would be included as part of the oCEMP to be submitted for the DCO application.

Carbon and Climate Change

3.1.12 With regard to carbon and climate change, the following indicative measures could be included as part of the oCEMP to be submitted for the DCO application, subject to further assessment. Measures could include:

- Lean design to minimise use of concrete, steel, aggregates, and other similar materials;
- Using locally sourced and/or produced materials;
- The condition and integrity of assets would be regularly assessed, and maintenance undertaken as early as required, giving consideration to materials with enhanced tolerance to fluctuating temperatures and exposure to rainfall;
- Measures to ensure safety and health of construction workers during extreme weather;
- An Emergency Response Plan would be developed which clearly establishes the procedures to be followed in relation to responding to flood warnings, fire events and other emergency events; and
- Ensure alternative access routes would be provided in the event of flooding in nearby areas. Ensure safe access is always available to key assets with consideration given to ground conditions.

4 Implementation

4.1 Implementation Strategy

4.1.1 The detailed CEMP would set out all roles, responsibilities and actions required in respect of implementation of the measures described within the oCEMP, which could include the following:

- An organogram showing team roles, names and responsibilities;
- Training requirements for relevant personnel on environmental topics;
- Information of onsite briefings and Toolbox Talks that will be used to equip relevant staff with the necessary level of knowledge to follow environmental control procedures;
- Measures to advise employees of changing circumstances as work progresses;
- Communication Strategy (internal and external);
- Procedures for monitoring, inspections and reporting of site operations;
- Document control; and
- Environmental emergency procedures.

4.1.2 The detailed CEMP is proposed to also include the following example details of the following measures:

- Construction Method Statements;
- Construction programme;
- Hours of work;
- Details of construction lighting;
- Details of site security and fencing arrangements;
- Details of Site set up, layout and use of Construction Compounds, including parking provisions;
- Information regarding procedures for the accidental release of potential pollutants including fuel/oil spillage and surface water release, including pollution incident response plans;
- Monitoring requirements; and
- How the oCEMP is in accordance with the SWMP, oCTMP and oBSMP.

5 Monitoring and Reporting

5.1 Process for Monitoring, Inspections and Audits

5.1.1 The following details with regard to potential approaches for monitoring, inspections and audits as part of the Project, is subject to Applicant approval and will be outlined in more detail as part of the oCEMP to be submitted as part of the DCO application, and would be finalised as part of the detailed CEMP:

- Monitoring and reporting would be undertaken for the duration of the construction phase in order to demonstrate the effectiveness of the requirements and measures set out in the detailed CEMP(s) and related construction controls and allow for corrective action to be taken where necessary;
- The Principal Contractor would be informed of any deviations from the detailed CEMP as soon as possible following identification of such issues, and if required further follow up would be sought. The Environmental Manager would also act as day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency;
- During construction, the Environmental Manager would conduct walkover surveys to ensure all requirements of the detailed CEMP(s) are being met. Actions from these surveys would be documented on an Environmental Action Schedule, discussed with the Site Manager for programming requirements and issued weekly for actioning; and
- The Environmental Manager would also arrange regular formal inspections and audits to ensure the requirements of the detailed CEMP(s) are being met. Details of monitoring, inspection and audits to be undertaken would be provided in the detailed CEMP(s). After completion of the works, the Environmental Manager would conduct a final review.

5.2 Records

5.2.1 The following details with regard to record keeping are subject to Applicant approval and will be outlined in more detail as part of the oCEMP to be submitted as part of the DCO application, and be finalised as part of the detailed CEMP:

- Records would be managed through the Quality and Safety Management Systems (QMS) and the Environmental Management System (EMS) of the Principal Contractor which would be certified in line with the ISO 14001 standards;
- The Environmental Manager/Project Manager would retain records of all monitoring, inspections and audits and records related to environmental issues at the Site. Documents would be stored in a suitable manner and backups created to safeguard the records; and
- The detailed CEMP(s) would be updated if it is necessary to add additional control measures, with a full review as required throughout the construction period. Existing control measures and mitigation would not be amended without prior agreement with Rother District Council, Folkstone and Hythe District Council.

South Brooks
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