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Morlais Project

Document MOR/RHDHV/DOC/0076: Outline Code of Construction Practice

Onshore works

Applicant: Menter Môn Morlais Limited

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GLOSSARY OF ABBREVIATIONS

BPM	Best Practicable Means
CCS	Considerate Constructors Scheme
CDM	Construction, Design and Management
CMS	Construction Method Statement
ECC	Export Cable Corridor
ECoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ES	Environmental Statement
EWC	European Waste Catalogue
CEMP	Construction Environmental Management Plan
CoCP	Code of Construction Practice
GCN	Great Crested Newt
HDD	Horizontal Directional Drilling
HIS	Habitat Suitability Index
IoACC	Isle of Anglesey County Council
ISMP	Invasive Species Management Plan
LPA	Local Planning Authority
MDZ	Morlais Demonstration Zone
ML	Marine Licence
MLWS	Mean Low Water Springs
MMP	Materials Management Plan
NRW	Natural Resources Wales
OCoCP	Outline Code of Construction Practice
ODA	Onshore Development Area
OMH	Open Mosaic Habitat
PPE	Personal Protective Equipment
PPG	Pollution Prevention Guideline
PPMP	Pollution Prevention and Management Plan
PRoW	Public Right of Way
RPE	Respiratory Protective Equipment
RSPB	Royal Society for the Protection of Birds
SWMP	Site and Excavated Waste Management Plan
TMP	Traffic Management Plan
TWAO	Transport and Works Act Order
WG	Welsh Government

1. INTRODUCTION

1.1. BACKGROUND

1. Menter Môn Morlais Limited ('the Applicant', hereafter referred to as Menter Môn) is seeking a Transport and Works Act Order (TWAo) and Marine Licence (ML) for the Morlais Project (hereafter the Project).
2. Menter Môn recognises that the provision of an Outline Code of Construction Practice (OCoCP), as part of the Environmental Statement (ES) submission, adds value to the ES and demonstrates consideration of the links between the findings of the ES, works anticipated to be required to construct and operate the Project and potential consent conditions.
3. This document seeks to set out a framework for a Code of Construction Practice (CoCP) for the Project, and the controls proposed to manage the environmental risks associated with construction works onshore.
4. Construction of the project is anticipated to begin between 2021 for onshore works and 2023 for offshore works.
5. The Project is described in **Chapter 4, Project Description** within the ES. In summary, the Project consists of three distinct areas within which components of the Project will be installed, as follows:
 - The Morlais Development Zone (MDZ), within which arrays of tidal devices and associated infrastructure such as foundations, array hubs, inter array cables, cable protection and other associated infrastructure will be deployed.
 - The Export Cable Corridor (ECC), within which up to nine export cables and associated cable protection will be laid. The ECC also includes the intertidal area, where the export cables will make landfall via either horizontal directional drilling (HDD) or trenching.
 - The Onshore Development Area (ODA) shares the export cable landfall with the ECC, with export cables then passing to a landfall substation, and from there via an onshore cable route to a grid substation and connection to grid.
6. The Project will install tidal devices in phases up to a potential maximum installed capacity of 240 MW.

1.2. PURPOSE OF THIS DOCUMENT

7. This OCoCP forms part of a set of documents that support the TWAo and ML applications submitted by the Applicant to Welsh Government (WG) and Natural Resources Wales (NRW).
8. This OCoCP is provided in support of the TWAo and ML applications to demonstrate the linkages between the impact assessment for onshore components of the Project (as detailed in Chapters 17 to 24 of the ES), onshore development activities and likely requirements associated with any consent. An Outline Construction Environmental Management Plan (CEMP) is also provided in support of the Project's consent applications and relates to the onshore works.

9. A final detailed CoCP will be produced prior to construction of the Project and will be based on the content of this OCoCP and the final design of the Project. It is anticipated that conditions through the TWAO will require the following elements, in line with current requirements for similar projects under the Development Consent Order process:
- a. No stage of the works may commence until a CoCP (which must accord with the OCoCP) has been submitted to and been approved by the local planning authority.
 - b. The CoCP must include details on –
 - (a) Compliance with relevant health, safety and environmental legislation;
 - (b) Local community Liaison responsibilities;
 - (c) Contaminated land and groundwater;
 - (d) Construction noise;
 - (e) Soil management;
 - (f) Construction method statements;
 - (g) Site and excavated material management;
 - (h) Surface water and drainage;
 - (i) Materials management plan;
 - (j) Screening, fencing and site security;
 - (k) Air quality; and
 - (l) Invasive species management.
 - c. The CoCP approved for the construction works must be followed.
10. The CoCP provides a mechanism, enforceable through condition, through which the relevant regulatory authorities can be assured that environmental impacts associated with construction in the ODA can be controlled and mitigated.
11. This OCoCP reinforces commitments made in the ES. **Chapter 27, Summary** also summaries all mitigation measures committed and designed into the Project.

2. SCOPE

12. The OCoCP sets out the management measures which the Applicant will require its contractors to adopt and implement for any onshore construction works for the Project and related off-site activities. Works and locations within the scope of this document include site preparation works, infrastructure construction, and commissioning phases of the project for onshore works (from the landfall at Mean Low Water Springs (MLWS) to the connection of transmission infrastructure at the Grid Connection Substation and at the Switchgear Building) and are defined to include:

- Landfall;
 - Landfall substation;
 - Onshore cable routes, accesses, trenchless crossing methods (such as HDD);
 - Switchgear Building; and
 - Grid Connection Substation.
13. The offshore project components will be constructed in a series of Phases to achieve final 240 MW installed capacity. The onshore works will reflect this as follows:
- i. Cable ducts would be installed together regardless of the offshore phasing;
 - ii. Cable pull through would be done in phases depending on the commissioning of tidal arrays in the MDZ;
 - iii. Landfall and Grid Substations, and the Switchgear Building ground preparation and construction works will be done in one phase; and
 - iv. The required electrical infrastructure and plant within the Landfall and Grid Connection Substations, and the Switchgear Building will then be installed as required for each phase of offshore construction.
14. The term construction for this OCoCP includes all onshore preparation, material delivery, excavated material reuse and disposal, waste removal, and all related engineering and construction activities as assessed in the ES.

3. GENERAL PRINCIPLES

3.1. ENVIRONMENTAL MANAGEMENT PRINCIPLES

15. The Applicant will operate an Environmental Management System (EMS) based on the requirements of ISO 14001:2015, that describes the processes and procedures by which the Applicant will identify and manage significant risks associated with its operations.
16. Contractors undertaking work on behalf of the Applicant will be screened and selected using a variety of criteria that include environmental credentials. The relevant management plans will set out how the appointed contractor will manage environmental risks associated with construction activities and will set out specific control measures necessary to deliver the requirements of the CoCP and any other mitigation measures that have been committed to by the Applicant and that relate specifically to the construction phase of the Project.
17. Several positions (relating to Environmental Clerk of Works etc.) are outlined in this OCoCP.
18. Prior to the commencement of each stage of onshore construction works the CoCP for that stage will be sent to the Local Planning Authority (LPA) for review and approval.

3.2. HEALTH AND SAFETY PRINCIPLES

19. The Applicant recognises that its decisions and activities have a direct impact on the health, safety and welfare of those working for the Applicant and on their behalf. The Applicant will set specific health and safety goals and monitor performance in relation to the construction, operation and maintenance of the Project. The final CoCP will include a health and safety plan, within which the Applicant will:

- Demonstrate commitment to health and safety by their actions and behaviours;
- Ensure Health and Safety issues are an integral part of project management throughout the Project's life; from design, through construction, operation and maintenance, repowering and future decommissioning.
- Require all designers to consider and include the control measures necessary to minimise the risks to the health and safety of all those engaged in construction, maintenance (and decommissioning) of the Project or to others who may be affected.
- Ensure that suitably competent employees and other designers, engineers, supervisors and contractors from other organisations are engaged to undertake the responsibilities associated with the Project.
- Ensure that all products, materials and processes used in construction, operation and maintenance present no significant risk to the health and safety of persons carrying out those duties or to others who may be affected by that activity.
- Ensure that suitable and sufficient resources, (including labour, materials, time and finances), are made available to effectively manage the health and safety requirements.
- Require that all those parties involved in the construction or operation and maintenance or demolition of the Project (Client, Designer, CDM Coordinator, Principal Contractor and all other Contractors), fulfil their roles and responsibilities both legal and organisational to health, safety and welfare.
- Require parties involved in the Project to have, where appropriate, a readily available, valid, suitable and sufficient Pre-Construction Information document and Health and Safety Plan as defined in the Construction (Design and Management) Regulations 2015.
- Ensure that on completion of construction works a suitable and sufficient Health and Safety File is completed.

3.3. CONSTRUCTION PRINCIPLES

20. The appointed Construction Manager and associated management team will be responsible for implementation of the CoCP provisions, and for ensuring that the various construction contractors are in compliance with its requirements. The practical implementation arrangements and responsibilities conferred to the construction contractors will be detailed in specific management protocols, to be developed pre-construction.

21. The provisions of the OCoCP / CoCP will be incorporated into the contracts for the construction of the Project. The Applicant and its implementing contractors will be required to comply fully

with the terms of the CoCP. Aims of the OCoCP / CoCP will include mitigation of nuisance to the public and safeguarding of the environment during construction. Construction activities will be monitored and policed by an Environmental Clerk of Works (ECoW) supported by other specialists as necessary (such as ecological, archaeological, auditing specialists).

22. In addition to the arrangements under this OCoCP, appointed contractors will be encouraged to register with the Considerate Constructors Scheme (CCS) which is a voluntary code of practice that seeks to:
- Enhancing the appearance of the Project's site(s);
 - Secure safety;
 - Respect the community;
 - Care for the workforce; and
 - Protect the environment.
23. The CCS required contractors to adhere to its Code of Considerate Practice.

3.3.1. Construction Method Statements

24. Detailed Construction Method Statements (CMS) will be developed by the Principal Contractor for relevant construction operations. Relevant CMSs will be included as part of the final CoCP for each stage of the works to be undertaken.
25. Each CMS will follow construction industry good practice guidance and adhere to the following measures:
- PPG01 – General guide to the prevention of water pollution;
 - PPG05 – Works near or liable to affect watercourses;
 - PPG06 – Working at construction and demolition sites;
 - PPG08 – Storage and disposal of used oils;
 - PPG11 – Preventing pollution at industrial sites;
 - PPG20 – Dewatering of underground ducts and chambers;
 - PPG 21 –Pollution incident response planning;
 - The Sustainable Drainage System (SuDS) Manual, C697, CIRIA (2007),
 - Site Handbook for the Construction of SuDS, C698, CIRIA (2007);
 - CIRIA Report C502 Environmental Good Practice on Site, CIRIA, (1999);
 - CIRIA Report C532 Control of Water Pollution from Construction Sites, CIRIA (2001);
 - CIRIA Report C648 Control of Pollution from Linear Construction Project Technical Guidance, CIRIA, 2006;
 - CIRIA Handbook C692 Environmental Good Practice on Site, CIRIA (2010) ;
 - CIRIA Handbook C651 Environmental Good Practice on Site Checklist (CIRIA) (2005).

3.4. LOCAL COMMUNITY LIAISON

26. The Applicant will ensure effective and open communication with local residents and businesses that may be affected by noise or other amenity aspects caused by the construction works. Communications will be co-ordinated on site by a designated member of the construction management team. A proactive public relations campaign will be maintained, keeping local residents informed of the type and timing of works involved, paying particular attention to potential evening and night time works and activities which may occur in close proximity to receptors. A combination of communication mechanisms such as posters and parish meetings will be employed to keep local residents informed.
27. A designated project local community liaison officer will respond to any public concerns, queries or complaints in a professional and diligent manner as set out by a project community and public relations procedure which will be submitted for comment to the Local Authorities. Town and Community Councils in the relevant area will be contacted (in writing) in advance of the proposed works and ahead of key milestones. This information will include indicative details for timetable of works, a schedule of working hours, the extent of the works, and a contact name, address and telephone number in case of complaint or query. Enquiries will be dealt with in an expedient and courteous manner. Any complaints will be logged, investigated and, where appropriate, rectifying action will be taken.
28. The above will be captured in a communications plan as part of the final CoCP.

3.5. EMBEDDED MITIGATION MEASURES

29. The Applicant has decided on a number of techniques and engineering designs/modifications inherent as part of the Project, during the pre-application phase, in order to avoid a number of impacts or reduce impacts as far as possible. Embedding mitigation into the project design is a type of primary mitigation and is an inherent aspect of the EIA process.
30. The following embedded mitigation measures are project commitments and are outlined here to ensure that they are captured and that their delivery is secured.

3.5.1. Measures to Mitigate Landscape and Seascape Impacts

3.5.1.1. Offshore Project Components Visible from Land

31. No visually prominent devices would be placed in the northern third of the site, sub-zones 1, 2 and 3 (as detailed in the ES, **Chapter 4, Project Description**) to reduce potential landscape and visual effects in relation to seascape/landscape and visual receptors to the north west of Holyhead Mountain.
32. No visually prominent devices will be placed in northern parts of sub-zones 4 and 8 (as detailed in the ES, **Chapter 4, Project Description**), for the same reasons as the point above.
33. A minimum separation distance of 1 km will be applied from the coastline for visually prominent devices, helping to increase the separation distance between such structures from the coastline.

34. Surface emergent project components will be minimised elsewhere within sub-zones to help ensure the composition of offshore elements is as simple as possible.
35. Further consideration could be given to mitigation at the detailed design stage, such measures could include:
 - The colour of the tidal devices;
 - The navigational lighting that is required; and
 - The layout configurations of tidal devices within arrays e.g. curved rows of devices or irregular placement.

3.5.1.2. Landfall Substation

36. Selecting a recessive location in the landscape, in a relatively low-lying position and using the landform to help integrate the landfall substation (cutting into the valley side rather than building a platform out).
37. Arrangement of plant and equipment within three buildings, resulting in a collection of buildings that break up the scale of the development and create a form and massing that is comparable with local agricultural buildings.
38. Using colours and materials (including natural materials) that are consistent with the vernacular associated with agricultural buildings and are recessive in the local context.
39. Using the buildings to define the boundaries of the landfall substation, reducing the requirement for security fencing.
40. Using stone walls and stock proof fencing as part of new boundaries.
41. Minimising the use of external lighting in this rural location.
42. Considering limited application of planting to help integrate the landfall substation, acknowledging the limitations associated with this in the open and exposed coastal landscape.

3.5.1.3. Grid Connection Substation

43. Positioning of the Grid Connection Substation in a location where industrial structures form an established part of the baseline context, and where established vegetation surrounding the site provides effective visual enclosure.

3.5.1.4. Switchgear Building

44. Positioning of the Switchgear Building within an allocated employment site, adjacent to an existing substation and where surrounding development will be comparable in form, massing and appearance.

3.5.1.5. Onshore Cable Corridor

45. Use of underground cabling to provide the connections between all Project elements, avoiding the need for overhead cables.

46. Routing the underground cable within the local road corridors as much as is possible, to minimise potential disruption to field boundaries.

3.5.1.6. Across the Onshore Development Area

47. Further consideration could be given to mitigation at the detailed design stage, such measures could include:
- Detailed design and materials selection for the substations;
 - Planting proposals around the substation sites; and
 - Detailed agreements over the types/design of field boundaries to be instated following the construction phase e.g. stone walls, cloddiau (hedge banks) or hedgerows.

4. GENERAL SITE OPERATIONS

4.1. WORKING HOURS AND TIMING OF WORKS

48. Onshore construction activities would normally be conducted during working hours of 7am to 7pm Monday to Friday and 7am to 1pm Saturdays. Evening or Saturday pm / Sunday working may be required to maintain programme progress and for specific time critical activities such as (HDD). However, these will be kept to a minimum and would be subject advance notification and agreement with the LPA.
49. Perimeter and site lighting may be required during working hours and a lower level of lighting may be needed overnight for security purposes.
50. Where works are undertaken outwith consented hours in response to emergency situations, the LPA will be advised as soon as practical, outlining the circumstances for the works, the likely duration and the mitigation measures implemented.
51. The Applicant will use best endeavours to minimise the duration of, and sensitively time, construction activities, with the LPA advised of the likely timetable of works. This timetable will also be shared with affected communities through a local community liaison officer.
52. The Applicant will make reasonable endeavours to minimise the duration of, and sensitively time, construction activities. The LPA will be advised of the likely timetable of works and the timetable will also be shared with affected communities through the local community liaison officer.

4.2. CONSTRUCTION SITE LAYOUT AND HOUSEKEEPING

53. The CoCP will include a site layout showing the location of mobilisation areas, HDD compounds, Landfall Substation, Grid Connection Substation and Switchgear Building temporary works areas, and other main features of the sites.
54. Pre-construction, site investigations will be required for the Project. Prior to any intrusive investigation or construction work, all existing service plans would be consulted, and a comprehensive service line location survey carried out in order to ensure that existing services are not disrupted. This would include radio detection, ground penetration radar and vacuum

excavation where necessary. A good housekeeping policy will be applied across all construction areas throughout the construction period. This will include the following requirements:

- Working areas will be kept in a clean and tidy condition;
- Site compound areas will be non-smoking. Specific areas within the worksites will be designated as smoking areas and will be equipped with containers for smoking waste. These will not be located at the boundary of working areas or adjacent to areas deemed sensitive to local residents, workers or visitors;
- Open fires and burning of rubbish are prohibited at all times;
- Music will not be played through speakers on any work site;
- Site waste susceptible to spreading by wind or liable to cause litter will be stored in enclosed suitable containers and waste will be removed at frequent intervals and the site kept clean and tidy.
- Static plant will have suitable drip tray protection;
- Hoardings and boundary fences will be frequently inspected, repaired and repainted as necessary; and
- Welfare facilities will be provided for all site staff and visitors.

4.3. SCREENING, HORDING AND FENCING

55. A Construction Fencing Plan will be included within the CoCP.
56. Landfall Substation, Switchgear Building, Grid Connection Substation, working compounds and laydown areas will be securely fenced.
57. HDD temporary construction compounds and laydown areas will be securely fenced using 2 m high hoarding and access from the local road network will be installed.
58. Use of acoustic fencing around specific noise generating plant at landfall is detailed further in **Section 9** of this OCoCP.
59. During construction of the onshore cable route, fencing will be installed to demarcate and secure the working area.
60. Where indicated by pre-construction surveys, badger proof fencing may be used to secure areas of the ODA and safeguard protected species.

4.4. PROTECTION OF HABITATS AND FEATURES OF CONSERVATION IMPORTANCE

4.4.1.1. Importance of Designated Sites

61. Toolbox talks will be delivered to all construction personnel detailing the importance of the protection of the designated sites:
 - A strict construction working footprint will be maintained;
 - Temporary fencing will be installed to physically delineate the rest of the designated site from the construction footprint;

- Materials and plant will be stored within the construction footprint;
- Habitats affected within and outwith the designated site will be combined within the habitat reinstatement plan; and
- A habitat re-instatement plan will be implemented upon completion of the works.

4.4.1.2. Landfall Trenching (if HDD not possible)

62. Prior to construction, further detailed botanical survey work is undertaken to ensure the risk of impacts to spatulate (South Stack) fleawort, golden-hair lichen and spotted rock-rose (and other areas of botanically rich vegetation) can be avoided. Such survey work should be carried out in May or June when fleawort is in flower. This survey work will support the decision of where the Onshore Cable Route is micro-sited to, enabling the footprint of overlap into the Royal Society for the Protection of Birds (RSPB) reserve to be minimised.
63. Consultation with NRW and RSPB will be undertaken to agree the final micro-siting of the landfall cable route if HDD cannot be achieved.

4.4.1.3. Habitats of Principle Importance

64. The following mitigation will be implemented to minimise the impact to Habitats of Principal Importance:
- Toolbox talks will be presented to all contractors to inform of the Habitats of Principle Importance present in the area;
 - Microsite to avoid hedgerow, marshy grassland, fen and open mosaic habitat where possible;
 - A strict construction working footprint will be maintained;
 - Temporary fencing will be installed to physically delineate the rest of the habitats of principal importance from the construction footprint;
 - Materials and plant will be stored within the construction footprint;
 - Habitats affected within and outwith the designated site will be combined within the habitat reinstatement plan;
 - Compensation habitat will be instated for any areas of Habitats of Principal Importance that are permanently lost;
 - A habitat re-instatement plan will be instigated upon completion of the works;
 - Root protection areas will be fenced off during construction;
 - A pre-construction assessment of all trees to be removed will be undertaken by a suitably qualified arboriculturist;
 - Where hedgerows are disturbed, they will be replaced following completion of construction activities to the same quality or better, with native species of local provenance. The replanting plan will be detailed in the EAP;
 - To mitigate impacts to the Open Mosaic Habitat (OMH) surrounding the aluminium works, habitat reinstatement will be undertaken upon completion of the construction

phase. This would involve the reinstatement of excavated material in a way that would provide low nutrient substrate suitable for ephemeral vegetation. The replanting plan will be detailed in the EAP. Since this area is subject to scrub encroachment it is possible that some localised disturbance will be beneficial (to reduce scrub and maintain patches of open habitat); and

- If trenching is required at landfall through the designated land, further consultation will be undertaken with NRW and RSPB to determine full mitigation, methodology and to obtain any necessary consents.

4.4.1.4. Cloddiau

65. Measures to minimise impacts to Cloddiau include:

- All Cloddiau to be left in situ will be clearly marked by a one metre buffer fence;
- A tool box talk will be presented by the ECoW to all construction personnel to ensure the importance of these features is understood;
- Where Cloddiau cannot be avoided by going around or underneath, the walls will be carefully dismantled by an appropriately trained professional and stored within a marked fenced area during construction;
- As soon as possible upon completion of construction activities, the stone walls will be rebuilt in a traditional style, reusing the original materials; and
- The CoCP will provide details of storage methods and locations of the vegetated stones.

4.4.2. Protection of Species of Conservation Importance

4.4.2.1. Otter and Water Vole

66. Prior to construction, a tool box talk on otter and water vole will be delivered to all relevant parties by the ECoW.
67. As otter and water vole are mobile species, a pre-construction survey for otter will be undertaken in all potential habitat prior to construction to confirm no otters have entered the project area since the 2018 surveys. This includes any watercourses, ditches or areas which may provide suitable resting sites.
68. Should evidence of otter or water vole be found, further consultation with NRW will be conducted to ascertain the most appropriate procedures to follow.
69. During construction activities, precautionary methods will be implemented to ensure risk of killing or injuring are minimised, such as including exit ramps on excavations.

4.4.2.2. Badger

70. A pre-construction survey will be undertaken for badgers and evidence of new badger setts prior to construction activities commencing. There are numerous areas of dense thick scrub within the ODA which could not be comprehensively searched for setts at EIA.

71. If any dense scrub requires clearance, precautionary checks for badger setts will be carried out while vegetation is removed before any more intrusive ground work is carried out. Where possible, the survey will be undertaken in winter months when the scrub vegetation is low and therefore more accessible.
72. A sett (Sett1) was recorded within a potential works area, as detailed in the confidential annex to of ES **Chapter 19, Onshore Ecology**. Under a worst-case scenario, Sett 1 is unavoidable, either because of HDD or trenching activities. If Sett 1 cannot be avoided, a licence would need to be obtained from NRW to temporarily or permanently exclude it. This may sometimes require the provision of a nearby replacement sett. A licence would restrict activities affecting the sett to the licensable period between July and November in a given year. A plan for sett exclusion and creation of artificial habitat will be developed in consultation with NRW and will be informed by preconstruction surveys (such as bait marking surveys) to determine the level of activity at the sett and surrounding habitat, and territories of resident badgers nearer the time of construction.
73. Precautionary methods will be implemented to minimise harm to badgers during construction, including use of exit ramps and covering trenches deeper than 1 m at the end of each working day to prevent animals becoming trapped.
74. Badger proof fencing will be used around areas of the ODA where work is active, to ensure badgers do not enter the site. Particular attention will be paid around the landfall.

4.4.2.3. Bats

75. The following mitigation will be included within the final CoCP:
- A toolbox talk by a suitably qualified ecologist will be undertaken as part of the induction of all construction staff;
 - A survey will be undertaken to confirm the presence or absence of the historic bat roost record. If present, a buffer of 30 m will be placed around the bat roost and works will not take place within this zone to avoid disturbance to this feature;
 - Building, tree or woodland removal is not anticipated. If it is required then further survey and assessment will be carried out, in consultation with NRW, to confirm that potential roost features are not present;
 - Night-time lighting of construction sites will be avoided where possible;
 - If night-time working is necessary, then lighting will be designed in accordance with Bats and artificial Lighting in the UK (BCT, ILE, 2018); and Guidance Notes for the Reduction of Obtrusive Light ILE (2011);
 - There will be no direct lighting of the woodland edges, scrub and hedgerow habitats, or historic roost site and use of dark buffer zones;
 - Consideration will be given and demonstrated of appropriate luminaire specifications, sensitive light configuration, screening, glazing, dimming and part-night lighting to minimise impacts;
 - Should a bat be encountered on site during the works, works will cease in that area and the advice of an experienced bat ecologist sought prior to re-commencing; and

- Hedgerow will be replanted following completion of construction works.

4.4.2.4. Reptiles

76. As reptiles are mobile, a pre-construction survey for reptiles will be undertaken in all potential habitat prior to construction.
77. Precautionary methods of working will be utilised, including clearance of vegetation under supervision of the ECoW and detailed in the CoCP. Details will be dependent on the timings of the work, and may include the following:
- Where possible, the works will be timed within the reptile active season (March to October inclusive);
 - A mitigation strategy for reptiles will be informed by the pre-construction survey and will be produced prior to construction and submitted to the LPA, including:
 - Trapping and translocation, if required;
 - Details of appropriate habitat improvement works to receptor sites for displaced reptiles;
 - Post construction monitoring
 - Details of the temporary fencing (including type, location and maintenance methodology) to be used to prevent reptiles from re-entering the site;
 - Details of ecological supervision during construction including a toolbox talk; and
 - Reptile welfare (including handling methodology).
78. Following construction, habitat will be reinstated as a minimum to the same value as before, using native species of local provenance.

4.4.2.5. Great Crested Newt

79. Great crested newt (GCN) was not found within the ODA during pre-construction surveys but is found within surrounding areas. GCN is a mobile species and pre-construction Habitat Suitability Index (HIS) and eDNA surveys (methodology to be agreed with LPA in advance of surveys) would be required to confirm the absence of GCN in the area.
80. A method statement will be drafted within the CoCP for what to do in the unlikely event an GCN is encountered on site.
81. A toolbox talk by a suitably qualified ecologist will be undertaken as part of the induction of all construction staff.

4.4.2.6. Bird Species

82. No construction works will take place within 500 m of an active chough nest during the breeding season.
83. A toolbox talk by the ECoW or a suitably qualified ecologist with ornithological expertise will be undertaken as part of the induction of all construction staff.

84. Vegetation removal will be carried out outside the breeding season for birds as far as possible. If vegetation removal is required within the bird breeding period, checks for nesting birds will be carried out by an ecologist; if nests are present the work will be delayed until young have fledged. This mitigation is not practical for large scale development and therefore should only be used if vegetation removal cannot be undertaken outside the bird breeding season in small parcels of land (for example where land access has been a constraint).
85. Pre-construction checks for potential barn owl nesting sites (focusing on agricultural buildings) will be undertaken, in case there are any nests within potential disturbance distance of onshore works. Should any active nests be found, works in the vicinity of the nest will stop pending advice by the ECoW or a suitably qualified ecologist with ornithological expertise on the requirement for a works exclusion buffer around the nest until breeding activity is completed (chicks have fledged, or a nesting attempt has failed).
86. Scrub, hedgerow, marshy grassland and maritime cliff and slope habitat that cannot be avoided will be subject to pre-construction walkover habitat survey in advance of construction commencing to inform the habitat reinstatement plans.
87. Habitat reinstatement will be undertaken following completion of construction, using native species of local provenance. Landscaping plans will take into consideration of creation of breeding bird habitat.

4.4.2.7. Notable Plant Species

88. A toolbox talk detailing the importance of these plant species will be delivered by the ECoW to all personnel working on site.
89. The location of the wild leek and small flowered catchfly will be clearly marked and identified with 5 m buffer fencing. This area will be avoided during any construction work. This may require a bypass section of track to be temporarily constructed.
90. Prior to construction, further detailed botanical survey work will be undertaken to ensure the risk of impacts to spatulate (South Stack) fleawort, golden-hair lichen and spotted rock-rose (and other areas of botanically rich vegetation) can be avoided. Survey work will be carried out in May or June when fleawort is in flower and morning time when spotted rock rose is more likely to flower.
91. If, under a worst-case scenario, the cables are trenched at landfall, further consultation will be undertaken with NRW and RSPB to determine appropriate methods, mitigation and any appropriate consents to undertake the work. This would include any habitat reinstatement and planting schemes which will be detailed in the CoCP, along with frequency of any required monitoring programme.

4.5. PROTECTIONS OF FEATURES OF HERITAGE IMPORTANCE

4.5.1. Heritage Assets

92. Pre-construction identification of potential archaeological sites through evaluation (geophysical survey potentially followed by trial trenching) will in turn feed into decisions regarding micro-

siting or route refinement, and the option to change design to use HDD on sections as part of the post-consent works. This will allow avoidance of sites wherever possible, ensuring they are preserved in-situ.

93. Where avoidance is identified as not being viable, consultation with stakeholders will be undertaken and a decision made between parties on how to proceed.

4.5.2. Scheduled Monuments – Porth Dafarch Hut Circles

94. If the field to the west of the road [adjacent to Porth Dafarch Hut Circles] is used for installation, it will be far enough away to reduce any impacts from potential vibration or hydrological changes.
95. HDD will be assessed as a potential construction method for this section and archaeological evaluation and investigation of the western field will be undertaken, to ensure any archaeological remains within the field that might be associated with the scheduled monument are preserved by record.

4.6. SITE INDUCTION

96. Construction of the Project will require all personnel working on site to have a site induction that includes an environmental protection and good practice component. Prior to commencing work on site, personnel must attend the site induction.
97. Site inductions will include reference to compliance with relevant planning / licence conditions, client environmental requirements (including the CoCP and PPMP), environmental management structure and contacts, site specific environmental sensitivities, waste management arrangements, water and wastewater management, hazardous material management, fuel, oil and chemical management; spill contingency and environmental emergency response, reporting of incidents and complaints. More specific information will be provided to staff according to their role.

4.7. SITE SECURITY

98. Security will be provided by contractors working on behalf of the Applicant to protect the public and staff, prevent theft from or damage to the works, and prevent unauthorised entry to or exit from the site.
99. Site gates will be closed and locked when there is no site activity and appropriate security measures will be implemented. Further details on site security measures will be provided in the final CoCP.

4.8. WELFARE

100. Active construction area will be serviced by temporary construction offices and necessary welfare facilities, including mess rooms, locker rooms, showers and toilet facilities, plus facilities for mobile construction teams. These will be in compliance with relevant legislation and codes of practice.

4.9. ARTIFICIAL LIGHT EMISSIONS

101. An Artificial Light Emissions Management Plan will be prepared detailing mitigation measures to be taken to manage emissions from artificial light, in accordance with good practice, such as the use of directional beams, non-reflective surfaces and barriers and screens, to avoid light nuisance whilst maintaining safety and security obligations.
102. Details of the location, height, design and luminance of all floodlighting to be used during the construction of the Project, together with measures to limit obtrusive glare to nearby residential properties, will be set out in the plan, which will be submitted to the local authorities for information prior to construction commencing.
103. The planned scheme will be maintained throughout the construction of the relevant works.
104. Site lighting will be positioned and directed to minimise nuisance to footpath users, residents, minimise distractions to passing drivers on adjoining public highways and to minimise skyglow, so far as reasonably practicable.
105. Lighting spillage will also avoid or minimise impacts on ecological resources, including nocturnal species.
106. So far as is practicable, all power to temporary lighting will be taken from mains supplies rather than from portable generators. Where portable generators are used, industry best practice will be followed to minimise noise and pollution from such generators.

4.10. REINSTATEMENT

107. Once all the trenching and excavation for the onshore cable route and landfall, HDD work area including transition pits, substation foundations areas and services, is completed and back-filled, stored topsoil will be re-distributed over the area of the relevant work section.
108. Long-term storage of topsoil in bunds or heaps will be avoided where possible.
109. The Project will seek to avoid conservation features such as, cloddiau and mature trees within hedgerows through the micro-siting of works, to retain as many such features as possible.

5. PUBLIC RIGHTS OF WAY

110. During construction, disruption to any public right of way (PRoW) will be managed to ensure continued safe access along the PRoW. The exact method will be agreed in advance with the LPA and detailed within the final CoCP. Methods available include:
 - Appropriately fenced (unmanned) crossing points;
 - Manned crossing points; and
 - Temporary alternative routes.
111. Following the cessation of construction works, all footpaths and other PRoWs will be reinstated to their original or an improved condition. Precise details for management of PRoWs to remain available during works will be agreed with the LPA prior to commencement of the works.

112. For all temporary alternative routes required, the following measures will be followed:

- A pre-and post-construction survey (including identification of surface condition and street furniture) of the PRoW affected will be undertaken. PRoW surveys will be undertaken by an experienced surveyor with scope of coverage and methodology agreed with the LPA.
- Where impacted by the works, the surveyed PRoW will be restored to its original condition or otherwise as agreed with the relevant LPA.
- The Applicant will advertise all alternative routes following the LPAs standards for advertising temporary closures of PRoW. This will include:
 - Provision of a map showing the extent of the temporary closure and an alternative route;
 - Confirmation that the alternative route is to another PRoW or roads or on land in the control of the Applicant;
 - Confirmation that the alternative route is safe and fit for public use;
- Town and Community Councils would be notified in advance (4–6 weeks) of temporary closures;
- A notice describing the temporary closure would be published in the press two weeks in advance of closure;
- Advanced site notices (i.e. notices to members of the public warning of diversions ahead) would be posted at appropriate places to minimise likelihood of trespass at obstruction and unnecessary aborted journeys;
 - Site notices would be erected in visible locations on site 1–2 weeks in advance of temporary closures;
 - Notices will describe the duration of temporary closure and the alternative route proposed.
- Extensions to closures of PRoW will be discussed with LPA.

6. INVASIVE SPECIES

113. This section of this OCoCP details the outlines the requirements for an Invasive Species Management Plan (outline ISMP), which would be developed in consultation with NRW and the LPA prior to construction.

114. Pre-construction surveys will be undertaken within the ODA to confirm and update invasive species locations and extents within the ODA. Surveys to inform the EIA identified four locations where Japanese knotweed was present within the EIA study area, with two of those locations are within the ODA.

115. The ISMP will include the following:

- A toolbox talk will be delivered by the ECoW to all personnel working on site;
- A pre-construction survey to ascertain up-to-date locations of any non-native invasive species within ODA, which overlap with proposed working areas;

- A buffer of 10 m will be placed around the known strands of non-native invasive species. If work is required in close proximity to the plants (e.g. within 7 m), advice from a specialist contractor to determine how any spoil generated from the work should be dealt with (for example, any possibly contaminated spoil may need to be disposed of at waste facility that is licenced to accepted controlled waste), and to agree an appropriate working method in this area. Treatment of strands of Japanese knotweed may be required if avoidance is not possible.
- Contractors confirmed protocol for removing Japanese knotweed from working areas (if present) and for managing the waste generated.

116. Good site practice measures for managing the spread of invasive species, include the following:

- Wheel-washing required before plant leaves each work area within the ODA; and
- All plant to be disinfected prior to use.

117. The need for an ECoW will be detailed in the ISMP, as will their responsibilities with respect to non-native invasive species, in particular:

- Procedure required should invasive species be found during construction, including demarcation of the area, installation of appropriate signage and procedure for updating and communicating the Invasive Species Management Plan; and
- Toolbox talk for contractors prior to construction on the known locations of and the identification of non-native invasive species, including information about other common invasive species and about the measures outlined above.

7. CONTAMINATED LAND AND GROUNDWATER (INCLUDING MATERIALS MANAGEMENT)

118. Chapter 18 of the ES (**Chapter 18, Ground Conditions and Contamination**) identifies receptors of perturbations to ground conditions (including groundwater) and mitigation measures proposed to reduce impacts. The control measures set out below are to be applied in order to ensure that any potential effects upon these receptors are adequately mitigated.

7.1. CONTROL MEASURES

119. Good environmental practice will be followed during the construction phase of the Project, in accordance with the Pollution Prevention Guidance (PPG1, PPG5, PPG6, PPG21 and PPG22).

120. A written scheme dealing with contamination of any land and groundwater will be submitted to the LPA for review before any stage of the Project commences.

121. Construction workers will be made aware of the possibility of encountering contaminated soils in made ground through toolbox talks. Safe working procedures will be implemented, good standards of personal hygiene will be observed and appropriate levels of Personal Protective Equipment (PPE) and respiratory protective equipment (RPE) will be provided and utilised as necessary, thereby minimising the risk of exposure to potentially contaminated soils, ground gas and ground water.

122. A Materials Management Plan (MMP) will be developed post-consent and include information regarding the coordination of planning, sourcing, purchasing, moving, storing and controlling materials in a sustainable manner, for example reusing materials on site where possible. The contractor will comply with the MMP during construction.

8. WASTE MANAGEMENT

123. The project waste assessment (**ES Appendix 18.2, Volume III**) assesses the impacts of the ODA in terms of waste generation during the construction, operation and decommissioning phases, taking into account the proposed options for recycling, recovery or disposal of waste, and the capability of the existing local or regional waste management facilities to manage the waste.

8.1. CONTROL MEASURES

124. A Site and Excavated Waste Management Plan (SWMP) will be prepared to record any decisions given to materials resource efficiency when designing and planning the works. Any assumptions on the nature of the Project; its design; the construction method or materials employed, in order to minimise the quantity of waste produced on site; or maximise the amount of waste reused, recycled or recovered, will be captured within the SWMP.
125. The SWMP will provide information on each waste type that is expected to be produced by the project with the appropriate European Waste Catalogue (EWC) code and description for each waste type. It will provide an estimate of the quantity of each type of waste and the proposed waste management option for each waste produced (i.e. re-use, recycling, recovery or disposal; on or off-site).
126. There are certain principles of waste management that can be applied to the majority of wastes that would be created during the construction phase. These are:
- Adhere to waste legislation for storage and handling on-site; and also ensure that the relevant regulatory controls have been applied to the reuse, recycling or recovery of waste on-site.
 - No waste from the project shall be deposited outside the boundary of the site, unless it is at a facility that holds a valid environmental permit or suitable authorised exemption. Off-site waste management facilities are legally obliged to operate under an environmental permit (or an authorised exemption), which is in place to ensure that the site is operated in a manner to prevent emissions causing harm to human health or the environment.
 - Ensure that those who remove waste from site have the appropriate authorisation (i.e. are registered waste carriers); and those facilities that receive waste from the site hold a valid environmental permit or authorised exemption.
 - Allocate space on site for the storage of waste materials and ensure that storage areas and containers are clearly labelled (appropriate signage) so site workers know which wastes should be put there. Paved areas/impermeable surfaces may be required, as considered necessary, to prevent direct contact with the ground.

- Hazardous waste must be stored separately from non-hazardous wastes to avoid contamination. The Hazardous Waste Regulations make it illegal to mix hazardous waste with non-hazardous waste.
- Provide separate containers for dry recyclables, such as paper and cardboard, plastic, glass, wood and metal at welfare facilities within contractor compounds. This would encourage recycling and increase the potential value of the recyclable items by avoiding contamination.
- Monitor the actual quantities of wastes produced during construction and update the SWMP to allow comparison with waste arisings estimated prior to construction. Record the proposed waste management option (e.g. reuse on site, recycle off-site, or dispose off-site) for each waste produced.
- All wastes that are removed off site would be described on a waste transfer note or hazardous waste consignment note (as appropriate) that tracks the movement of the waste to the specified disposal or recovery facility.
- Contractors should identify appropriate staff that are responsible for waste management; and ensure that all contractor staff are aware of the appropriate reuse, recovery or disposal routes for each waste.

127. The measures outlined above promote sustainable waste management practices by maximising waste prevention, re-use, recycling and recovery opportunities for material destined for offsite waste management. They actively discourage sending waste to landfill and promote the waste hierarchy, a legal requirement.

9. NOISE

128. There is the potential for noise to be generated during the construction process, especially from heavy plant and machinery. Measures will be implemented on site to minimise any effects and a programme of monitoring may be required.

9.1. CONTROL MEASURES

129. A Construction Noise Management Plan will be included in the final CoCP. The Construction Noise Management Plan will apply throughout that stage of construction and will details the 'Best Practicable Means' (BPM) that the contractor will adopt to minimise noise. Measures may include:

- Where possible, locating temporary plant so that it is screened from receptors by on-site structures, such as site cabins;
- Using modern, quiet equipment and ensuring such equipment is properly maintained and operated by trained staff;
- Applying enclosures to particularly noisy equipment where possible. At the landfill location the HDD works will be mitigated by use of 3.5 m high demountable fencing, with the wider work area demarked by a 2 m hoarding fence;
- Ensuring that mobile plant is well maintained such that loose body fittings or exhausts do not rattle or vibrate;

- Ensuring plant machinery is turned off when not in use;
- Providing local residents with 24-hour contact details for a site representative in the event that disturbance due to noise from the construction works is perceived;
- Establishing a community engagement process including informing local residents about the construction works, detailing the timing and duration of any particularly noisy elements, and providing a contact telephone number to them; and
- Keeping noisy deliveries to the middle of the day where possible.

10. AIR QUALITY

130. Chapter 22 of the ES (**Chapter 22, Air Quality**) identifies receptors that are potentially sensitive to air and dust emissions. The control measures set out below are to be applied in order to ensure that any potential effects upon these receptors are adequately mitigated.

10.1. CONTROL MEASURES

131. A number of mitigation measures in relation to the emission of dust and other emissions during construction works have been identified. The name and contact details of person(s) accountable for air quality and dust issues shall be clearly displayed at suitable positions along the site boundary. This would generally be the environment manager/engineer or the site manager. In addition, it is recommended that contact information for the contractor's head or regional office is also clearly displayed.

10.1.1. Dust Management

132. Throughout the construction works, the following dust management measures shall be implemented to maintain suspended particulates to suitable levels.
- A complaints log shall be made available to the LPA, if requested.
 - Any exceptional incident that causes dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation shall be recorded in the log book.
 - In-combination effects with other ongoing developments within 500 m of the site boundary shall be managed through liaison with other sites to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. Measures may include consideration of the local road network and delivery routes.
 - Daily onsite and offsite inspections shall be conducted where there are nearby receptors. Collected data is to be recorded in a log book which shall be made available to the local authority to audit on request. This log book shall also include recordings of regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of the site boundary (subject to landowners' approval).
 - Should a certain construction activity be considered to have a high potential to produce dust, or during prolonged periods of dry or windy conditions, the frequency of site inspections by the person accountable for air quality and dust issues on site shall increase.

- Any stockpiles of excavated material shall be covered, seeded or fenced to prevent wind whipping.
- Wherever practicable, battery powered equipment shall be used over petrol- or diesel-powered options. The use of petrol- or diesel-powered generators should be avoided where possible.
- A Traffic Management Plan (TMP) will be produced to manage the sustainable delivery of goods and materials to and from site. An accompanying Travel Plan will support and encourage sustainable travel for contractor operatives and staff (public transport, cycling, walking and car-sharing).
- An adequate water supply must be provided onsite for effective dust suppression measures. Water should be non-potable water wherever possible.
- Equipment will be readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
- Sand, aggregates, cement and other fine powder material will be stored in a controlled and well-managed manner
- Smaller supplies of fine powder materials will ensure bags are sealed after use and stored appropriately to prevent dust release.

10.2. MEASURES SPECIFIC TO EARTHWORKS

133. Measures specific to earthworks include:

- Avoidance of dry sweeping of large areas;
- Inspection of work access tracks for integrity and instigate necessary repairs to the surface as soon as reasonably practicable and regularly dampen down with fixed or mobile sprinkler systems, or mobile water bowsers, where necessary.
- Record all inspections of the access tracks and subsequent action in a site log book.
- Ensure an adequate area of hard surfaced road between the wheel wash facility and the site exit, as site size and layout permits. Locate site access gates at least 10 m from receptors where practicable.

11. PROTECTION OF SURFACE AND GROUNDWATER RESOURCES

134. Chapter 17 and 18 of the ES (**Chapter 17, Water Resources and Flood Risk** and **Chapter 18, Ground Conditions and Contamination**) include applicable mitigation measures for the construction and operational phases of the Project. The measures have been provided to reduce the impact of the Project on the surface and groundwater resources. In particular, the control measures are designed to manage disturbance to surface water bodies, accidental contaminant release, flood risk, groundwater contamination and surface water contamination. Control measures identified are set out below.

11.1. CONTROL MEASURES

11.1.1. Surface Water Bodies

135. Measures to manage disturbance to surface water bodies include:

- Minimisation of the time that temporary dams are in place, with flumes or pumps sized to maintain flows downstream of the obstruction whilst minimising upstream impoundment. Scour protection would be used to protect the bed downstream of the dam from higher energy flows at the outlet of the flumes or pumps. A fish rescue (if necessary) would be undertaken in the area between the temporary dams prior to dewatering.
- Cable ducts would typically be installed 2 m below the bed of the watercourses (sufficient to account for climate-related changes in fluvial flows and erosion). This would be dependent upon local geology and geomorphological risks (e.g. bed scour and channel instability) and avoid exposure during periods of higher energy flow where the bed could be mobilised.
- Vegetation would not be removed unless necessary to undertake the works; any vegetation removal would be restricted to the smallest practicable footprint.
- Where possible, localised improvements to the geomorphology and in-channel habitats will be considered the watercourse is crossed using open cut techniques. This will include sympathetic reinstatement of banks (e.g. by replacing re-sectioned banks with more natural profiles that are typical of the natural geomorphology of the watercourse). Note that any improvements would be restricted to within the works area of the Project.
- Buffer strips of vegetation will be retained adjacent to watercourses where possible. Where surface vegetation has been removed, it will be reseeded to prevent future runoff (excluding arable crops).

11.1.2. Accidental Release of Contaminants

136. An Outline Pollution Prevention and Management Plan (**Document MOR/RHDHV/DOC/0077**) has been developed to accompany the consent applications for the Project and its measures will be followed. Wider measures to manage accidental release of contaminants will include:

- Retention of buffer strips of vegetation adjacent to the watercourses, to intercept surface runoff and any dissolved or particulate contaminants associated with it.
- Design of cable installation activities ensure that they will not affect groundwater in any significant manner. The majority of excavations will be shallow (approximately 1.7 m deep), except for instances where HDD (or a similar method) is used.
- Verify any abstractions within the onshore cable corridor with the landowners prior to construction and ensure suitable mitigation measures are employed at that point to ensure no adverse effects on water supplies occur.

11.1.3. Surface Flood Risk

137. Measures to manage surface flood risk include:

- Development of a drainage strategy including use of swales to allow for drainage of excess surface water from the ODA.

- Use of permeable surfacing where applicable within substation and switchgear building areas.
- Use of flood-resilient building materials e.g. concrete floors and walling.
- Use of raised electrical infrastructure to prevent flooding of critical infrastructure during a surface water flood event.

11.1.4. Groundwater Contamination

138. Measures to manage potential groundwater contamination include:

- Adherence to PPMP, including Incident/Emergency Response Plan.
- Avoidance of construction in areas of historical development, including all historic pits and area of infilled land that has previously been identified.
- Cessation of works should unanticipated contamination be encountered during the work, and development of a written statement on how contamination will be dealt with should be agreed with the local authority.
- If piling is required in areas previously identified as potential sources of contamination, additional mitigation measures may be required prior to piling activities commencing, this may include a ground investigation to identify areas of concern and/or remediation.

11.1.5. Surface Water Contamination

139. Best practice will be followed, including the following mitigation: Construction Design Management Regulation (CDM, 2015); CL:AIRE Industry Code of Practice for waste management; and the Environment Agency groundwater protection pollution prevention guidance (PPG).

12. MONITORING AND SITE INSPECTION

140. The mitigation measures described above will be monitored by the Contractors' environmental management representatives and the ECoW throughout the construction phase. If non-conformity with any of the mitigation measures is identified, it will be recorded during a site audit and appropriate remedial actions will be implemented.

141. A monitoring programme will be established for environmental aspects associated with the ODA, which will be documented in the final CoCP.

13. ENVIRONMENTAL INCIDENT RESPONSE AND CONTINGENCY

142. An Outline Pollution Prevention and Management Plan (PPMP) has been prepared (**Document MOR/RHDHV/DOC/0077**). The final PPMP will contain a project and site-specific environmental emergency / incident response plan. The plan will include a response flow chart and detail how to report and deal with an environmental incident, including the measures available to contain/clean up an incident (e.g. spill kits, waste reception facilities). A contact list for notifying relevant stakeholders will be appended to the plan.

143. Personnel working on site, including any subcontractors will be trained in the project environmental emergency response procedures, so that they are prepared and able to respond to an incident promptly and effectively.
144. If, during construction, remains are found unexpectedly on a site not known to be a burial ground, they will not be removed. In such circumstances, the local environmental health officer and the project archaeologist will be consulted to assess the remains. If it is concluded that they are modern, the police will be consulted. If the police have no interest and it is necessary to exhumate the remains, then an application for a licence will be made to the Ministry of Justice immediately.

14. REFERENCES

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PPG05 – Works near or liable to affect watercourses;

PPG06 – Working at construction and demolition sites;

PPG08 – Storage and disposal of used oils;

PPG11 – Preventing pollution at industrial sites;

PPG20 – Dewatering of underground ducts and chambers;

PPG 21 –Pollution incident response planning;

PPG 22 – Dealing with Spills;