Teddington Direct River Abstraction

Preliminary Environmental Information Report
Appendix 4.3 – Draft Code of Construction Practice

Volume: 3

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Appendix 4.3 – Draft Code of Construction Practice

A.1 Overview

Introduction

A.1.1 This document is a draft version of a Code of Construction Practice (CoCP) that will accompany the Development Consent Order (DCO) application for the Teddington Direct River Abstraction Project (the Project).

A.1.2 The draft CoCP sets out the measures that are proposed as the outline basis for the Construction Environmental Management Plan (CEMP) to control and manage environmental impacts of the Project during construction.

A.1.3 This draft version of the CoCP has been produced as part of the Preliminary Environmental Information (PEI) Reportbeing made available in support of the Project's statutory consultation. It is intended that the release of this draft CoCP will help explain how construction works will be managed to mitigate effects on the local community and the environment. It will also facilitate feedback and constructive engagement with stakeholders as the mitigation measures and controls are being developed for the DCO application.

A.1.4 Table A.1 sets out the stages through which the CoCP and CEMP will be developed through the stages of the Project. The CoCP will be developed ahead of DCO application and then during the DCO examination before being finalised. After the DCO is made the CoCP will be developed further by the contractor within their CEMP.

Table A.1 Development stages of the Code of Construction Practice / Construction Environmental Management Plan

Project stage	Version of the CoCP/CEMP
Design stage Statutory Consultation	Draft CoCP. This version. Produced in support of the PEI Report and Statutory Consultation.
Design stage DCO submission	CoCP. Application version. Developed in support of the Environmental Statement. Submitted as part of the application for development consent.
Design stage DCO examination	CoCP. Final version. Developed legally certified under the DCO.
Construction	CEMP. Developed by the contractor to set out how the commitments in the CoCP and legally required under the DCO will be implemented.

A.1.5 An updated version of the CoCP will be submitted with the DCO application taking account of feedback from consultation and stakeholder engagement and

the environmental assessment work being undertaken to inform the Environmental Statement (ES). The CoCP will be kept under review throughout the public examination of the application for development consent, taking into account submissions made during that process. The final version of the CoCP at the end of the examination will become certified when the DCO is made.

A.1.6 The final CoCP will outline the measures that will be developed in the CEMP to be implemented by the contractor to mitigate potential effects on the local community and environment during construction. The measures set out in the CoCP will be legally binding under the DCO. The contractors responsible for the delivery of construction will be required to develop a CEMP substantially in accordance with the CoCP to control environmental impacts during the relevant works for acceptance prior to the commencement of works.

Summary description of the Project

A.1.7 The Project is a vital drought resilience project designed to provide additional water capacity to London under drought conditions.

A.1.8 The Project involves establishing a new abstraction site on the River Thames near Teddington Weir. The abstracted water would be transferred to Lockwood Pumping Station, part of Thames Water's Lee Valley reservoirs in north-east London, and replaced by recycled water from a new tertiary treatment plant (TTP) within the existing Mogden Sewage Treatment Works (STW) through a new outfall also near Teddington Weir. A schematic of the Project is presented in Figure A.1.

A.1.9 The Project comprises the following principal components:

a. A new TTP constructed on a platform above some of the existing storm tanks at Mogden STW to process a portion of the final effluent with an output of up to 75Ml/d of recycled water (shown as point 3 in Figure A.1)

b. A tunnel boring machine (TBM) drive shaft and recycled water interception shaft at Mogden STW site

c. A new recycled water conveyance tunnel with an approximate 3.5m internal diameter, between Mogden STW and the Burnell Avenue site for the transfer of up to 75Ml/d of recycled water between the TTP and the outfall discharge infrastructure (shown as point 4 in Figure A.1)

d. An intermediate shaft at the Ham Playing Fields site

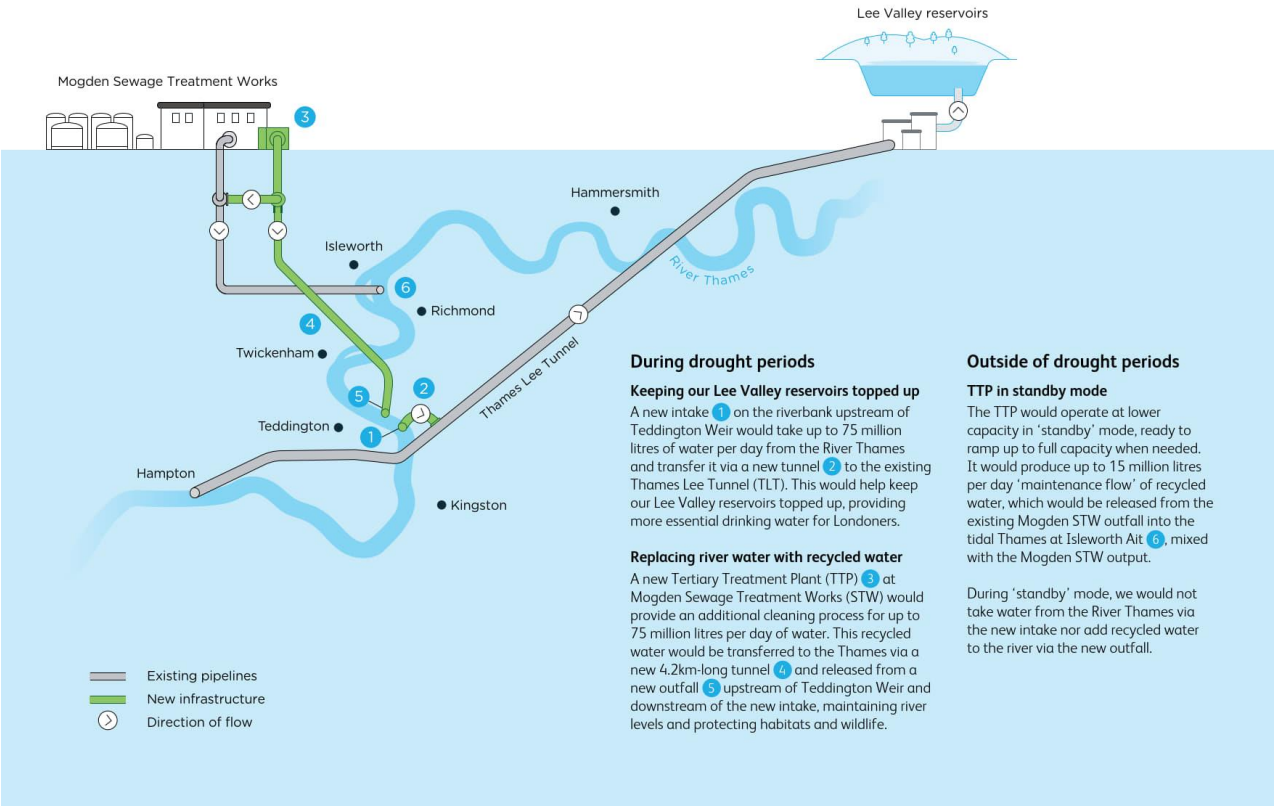
e. A recycled water conveyance tunnel reception shaft and connecting conveyance pipe to the outfall structure for the discharge, located on land to the south of the Burnell Avenue site

f. A new outfall structure for discharging up to 75Ml/d of recycled water, located either on the bankside or near the bankside in the River Thames upstream of Teddington Weir (shown as point 5 in Figure A.1)

g. A new abstraction intake structure, which will take up to 75Ml/d of raw water from the River Thames. This is located on the bankside or near bankside in-river of the River Thames, approximately 180m upstream of the new outfall structure (shown as point 1 in Figure A.1).

h. A new abstraction connection shaft and raw water conveyance pipeline connecting to the existing Thames Lee Tunnel (TLT). Two options are considered for the TLT connection (shown as point 2 in Figure A.1).

Figure A.1 Schematic of the Project and principal components



A.1.10 Further information on the Project and its construction is provided in Volume 1, Chapter 2: Project Description of the PEI Report.

Purpose of the CoCP

A.1.11 The CoCP sets out a framework for:

a. The management of environmental mitigation measures and controls during construction

b. Communication and engagement with the local community and local authorities during construction

Structure of the CoCP

A.1.12 It is currently intended that the final CoCP will comprise two parts:

a. Part A: General controls. These measures are applicable Project-wide, across all construction sites and compounds.

b. Part B: Site-specific controls. These measures refine and supplement the controls set out in Part A with measures applicable at specific construction

sites and compounds, recognising that these vary with location and the types of activities being carried out.

A.1.13 This draft CoCP relates to Part A and is focused on general requirements and standard industry good practice.

A.1.14 Part B will be developed as the ongoing Environmental Impact Assessment (EIA) progresses, with refinement of the Project and identification of locally specific potential significant effects and how these can avoided or mitigated. It is anticipated that additional mitigation measures will be incorporated into an updated CoCP to accompany the DCO application.

A.1.15 Section A.2 sets out the context for this draft CoCP, introducing the EIA process and the underlying mitigation principles adopted for the Project.

A.1.16 Mitigation measures to be taken during construction are presented in Sections A.3 to A.14. Measures relating to community and stakeholder engagement are presented in Section A.3. General site management measures are presented in Section A.4 and measures specific to in-river work in Section A.5. Measures for the control of specific environmental aspects are then presented in Sections A.6 to A.14.

A.2 Approach to environmental management

Environmental Impact Assessment process

A.2.1 The EIA process involves systematic assessment of likely significant effects of proposed development and identification of mitigation to avoid or reduce them. As the EIA for the Project proceeds, mitigation is being identified for inclusion within the CoCP or other appropriate control documents to be secured as integral components of the DCO.

A.2.2 Details of the approach to EIA for the Project are presented in Volume 1, Chapter 4: Approach to Environmental Assessment of the PEI Report.

A.2.3 At this stage of Project development, the EIA is at a preliminary stage. A PEI Report has been prepared to facilitate an understanding of the likely environmental effects of the Project to support the statutory consultation and inform design development and further assessment of the Project ahead of the DCO application, which will include the submission of the ES. This draft CoCP is presented as an appendix to the PEI Report to support the consultation process.

Mitigation principles

A.2.4 The Project is being developed in iteration with an ongoing EIA. Through this process, mitigation measures are being developed on a hierarchical basis as follows:

a. Avoidance and prevention: design and mitigation measures to prevent the effect (e.g. alternative design options or avoidance of environmentally sensitive sites)

b. Reduction: where avoidance is not possible, then mitigation is used to lessen the magnitude of impact or significance of effects.

A.2.5 This draft CoCP is primarily concerned with setting out standard good practice measures which can be identified at this stage of Project development. As the design is further developed and as the EIA progresses synchronously, the CoCP will be supplemented with additional mitigation measures to manage specific potentially significant environmental effects. These measures will be set out in an updated CoCP to be submitted alongside the DCO application and refined further in a detailed CEMP post consent, to be submitted by the contractor for acceptance before works can commence.

Commitments register

A.2.6 The Commitments Register (Volume 2, Appendix 4.2) lists the commitments to environmental mitigation identified in the EIA Scoping Report (Thames Water, 2024) and PEI Report (and in due course will include environmental mitigation identified in the ES and related assessment documentation) to reduce adverse effects or to achieve good design objectives.

A.2.7 Those mitigation measures relied on in the assessments presented in the PEI Report (Volume 1) and therefore incorporated in the Commitments Register, that have been transposed into this draft CoCP can be identified with a cross reference to an identifier used in the PEI Report version of the Commitments Register (Volume 2, Appendix 4.2), referred to as a Provisional Commitment Reference number (PCR).

Topic-specific management plans

A.2.8 It is anticipated that the DCO will require the CEMP to include detailed topic-specific management plans developed by the contractor for the control of matters including but not limited to:

a. A plan for the management of noise and vibration

b. A plan for the management of air quality and dust

c. A plan for the management of ground and surface water including measures for the prevention of pollution

d. A carbon and energy management plan setting out how the Project will minimise its carbon impact during construction and operation

e. A landscape and ecology management plan setting out measures for the planting, establishment and management of the landscaped and habitat mitigation elements of the Project

f. A biodiversity net gain (BNG) habitat management and monitoring plan that outlines how the land will be managed, monitored and maintained to ensure the long-term success of habitat enhancements and creation, underpinning a commitment to BNG

g. An archaeological mitigation strategy setting out mitigation for heritage and cultural heritage assets. Written schemes of investigation would be

prepared for areas of archaeological interest identified as requiring mitigation.

h. A construction traffic management plan setting out temporary traffic management measures during construction to provide safe access to worksites and to reduce the impact of construction traffic on the local community

i. A construction workforce travel plan identifying measures to reduce the impact of the Project's construction workforce on the road network as a result of travel to and from worksites

j. A site waste management plan setting out measures for the management of waste during the construction phase. Measures would include waste characterisation and segregation.

k. A materials management plan setting out the approach for handling construction materials and waste. It would provide for handling of excavated materials and reuse of soils.

A.2.9 It is anticipated that these topic-specific management plans would be developed by the contractor, having regard for the measures outlined in the CoCP for approval before works can commence.

Roles and responsibilities

A.2.10 Thames Water is the company responsible for the delivery of the Project, in whom the powers of the DCO would be vested. Thames Water is responsible for all the works, which include overseeing and assuring the activities carried out by its contractors.

A.2.11 The appointed construction contractors will be contractually required to deliver the construction works in accordance with the terms of all the DCO requirements, including the final CoCP.

A.2.12 The contractor shall provide suitably qualified and experienced personnel for the following key environmental management functions:

a. Project director to be responsible, amongst other matters, for ensuring systems are in place to ensure compliance with environmental legislation and consents; to maintain, update and implement the CEMP; for monitoring compliance during construction, including the carrying out of regular monitoring and inspections of construction work activities; and for induction courses on environmental issues

b. Environmental manager to have primary responsibility for managing environmental issues during construction and for obtaining any relevant licences and consents not secured when construction commences and to maintain, update and implement the CEMP

c. Ecological Clerk of Works to oversee the implementation of ecology mitigation and ensure that construction works are carried out in accordance with the requirements of protected species licences

A.2.13 The actual title of the staff undertaking these functions may vary from those indicated above.

A.2.14 The environmental manager will be supported by other specialists as necessary (which may include, but not be limited to, air quality, geo-environmental, noise and vibration, landscape, ecological, arboricultural and archaeological specialists).

Environmental management system

A.2.15 The contractor shall develop and implement an environmental management system accredited to British Standard EN ISO 14001: Environmental Management (British Standards Institution (BSI), 2024) to ensure and demonstrate that all relevant legislation, standards, regulations and consents are being met.

A.2.16 The environmental management system shall set out:

a. The contractor's environmental policy

b. The procedures to be implemented to deliver and monitor compliance with environmental legislation

c. Staff competence and awareness requirements and how these are achieved and maintained

d. The procedures to be implemented to deliver and monitor compliance with the environmental provisions in the CoCP

Considerate Constructors Scheme

A.2.17 The contractor shall sign up to and adhere to the Considerate Constructors Scheme.

A.2.18 The Considerate Constructors Scheme is a national scheme that promotes good practice on construction sites through its codes of considerate practice (Considerate Contractors Scheme, 2023); these commit registered sites to be considerate and good neighbours, as well as being respectful, environmentally conscious, responsible and accountable.

Enforcement

A.2.19 Compliance with the provisions of the CoCP will be enforceable as a Requirement of the DCO in accordance with the provisions of section 161 of the Planning Act 2008.

A.3 Community and stakeholder engagement

Community engagement

A.3.1 During construction, a community liaison officer shall be appointed, supported by a liaison team as necessary who will:

a. Liaise with relevant local authorities; other statutory bodies and regulatory authorities; community councils and relevant community groups; and businesses and residents in local communities affected by the construction works (PCR 58)

b. Support the production of Project communications which may include updating the Project website and preparing newsletters with updates that are relevant to the local community and stakeholders (PCR 58)

Enquiries and complaints

A.3.2 The contractor shall establish a telephone helpline together with an email address and postal address for enquiries and complaints during the construction phase. The relevant contact numbers, email and postal addresses will be displayed on signs around the construction site where reasonably practicable. Enquiries and complaints will be logged in a register and appropriate action will be taken in response to any complaints. (PCR 58)

Notice of work

A.3.3 The contractor shall notify occupiers of nearby properties that could be impacted in advance to inform them of the nature and anticipated duration of planned construction works. (PCR 58)

A.4 General site management

Staff induction and training

A.4.1 A site induction will be provided to all staff and as a minimum will cover the following:

a. Project overview
b. Project environmental and sustainability objectives
c. Expectations regarding behaviour and conduct whilst on-site including respecting and showing courtesy to and supporting the local community
d. Welfare facilities
e. Environmental and safety roles and responsibilities
f. Site safety including specific hazards
g. Environmental constraints on-site
h. Traffic management measures including routes to access working areas
i. Incident and near miss reporting
j. Fire and emergency procedures
k. Environmental protection measures
l. Regulations governing storage, handling, treatment and disposal procedures for all wastes
m. Pollution prevention
n. Housekeeping

A.4.2 All construction staff will receive appropriate training on their responsibilities for minimising the risk to the environment and implementing the measures set out in the CEMP and the associated management plans.

A.4.3 The contractor will be responsible for identifying the training needs of their personnel to enable appropriate training to be provided.

Security and public access

A.4.4 The site boundary will be secured and constructed such that it minimises opportunities for unauthorised entry.

A.4.5 Access to sites will be limited to securely gated entry points.

A.4.6 The site boundary may be monitored remotely by closed circuit television at relevant locations. These locations will be determined in consultation with the local authority or the Metropolitan Police, as appropriate.

A.4.7 Should the site boundary suffer any damage that could compromise security, it will be immediately rectified by the contractor.

A.4.8 The contractor will complete site-specific assessments of the security and trespass risk at each site and implement appropriate control measures.

A.4.9 The contractor shall consult with local crime prevention officers to determine security proposals for each site and to identify any security issues and liaise regularly to review security effectiveness and response to incidents.

A.4.10 In the event that a worksite becomes inactive, the employer shall ensure that site security, safety and condition of hoardings are maintained.

Working hours

A.4.11 Construction works will be programmed to adhere to standard working hours of the host local authorities:

a. Monday to Friday:
    i. All three host local planning authorities (LPAs): 08:00 to 18:00
b. Saturday:
    i. London Borough of Hounslow: 09:00 to 13:00
    ii. London Borough of Richmond upon Thames and Royal Borough of Kingston upon Thames: 08:00 to 13:00

A.4.12 Some works will be required to be undertaken outside of these core hours. These will include:

a. Shaft sinking which will require a 12-hour working day to provide adequate time to safely complete the excavation and lining sequence
b. Tunnelling work at the Western Work Area as well as access to the interception and intermediate shafts for health and safety reasons which will require a 24-hour, seven days a week (24/7) operation. Once the tunnel boring machine (TBM) starts, it should not be stopped for extended periods to prevent issues such as ground squeezing around the TBM leading to it becoming trapped.

c. TLT connection activities at the Tudor Drive and Burnell Avenue sites which will require 24/7 construction working as per the TBM where activities should not be stopped

d. Long duration concrete pours associated with the storm tanks and the tertiary treatment plant

e. Construction site and equipment maintenance and upkeep including replacement of plant and equipment

f. Utility diversion works subject to the requirements of the provider

g. Emergency works

A.4.13 Additional works may also need to be undertaken outside of the standard working hours and would be developed in consultation with the relevant LPA depending on the location and nature of the activity.

A.4.14 The contractor shall review working hours when extreme weather conditions (such as high rainfall, high/low temperatures) are forecast (i.e. Amber and Red warnings from the Met Office), with consideration of start and finish times as well as required break schedules and appropriate personal protective equipment. [PCR 65]

Worksite layout and good housekeeping

A.4.15 The contractor shall ensure that the site layout and appearance is designed according to the following principles:

a. All sites will be fully secured with appropriate hoardings or fences. The extent and height of hoarding or fencing at a particular location will be selected to maintain effective security and achieve appropriate noise attenuation, dust containment and visual screening.

b. Hoardings, fencing and screens will be maintained in good condition throughout construction.

c. Appropriate sight lines/visibility splays will be maintained to ensure that the safety of both vehicles and pedestrians is preserved.

d. Temporary fences may be used in certain areas, such as for short-term occupation of sites.

e. The contractor shall display an information board at appropriate locations on the boundaries of sites containing an emergency contact number and a general helpline number.

f. Notices will be displayed on all site boundaries, where appropriate, to warn of hazards on-site such as deep excavations and construction access.

g. Measures shall be implemented to protect trees. (Further details of measures to protect trees are set out in Section A.11: Ecology and landscaping.)

h. Where reasonably practicable, existing walls, fences, hedges and earth banks will be retained.

i. Noise generating activities will be sited away from noise sensitive receptors where reasonably practicable, or screened, so as not to exceed agreed

levels. (Further details of measures to manage noise and vibration are set out in Section A.8: Noise and vibration.)

j. Storage sites, temporary offices, fixed plant and machinery equipment will be positioned to minimise environmental impacts, having due regard to neighbouring properties and the constraints of each site.

k. Internal vehicle routes will be arranged to minimise the risk of carrying mud out of the site.

l. Site drainage will be carefully considered to avoid areas of mud or other materials in one part of the site contaminating other areas. (Further details of pollution prevention measures are out in Section A.10: Ground and surface water.)

m. Security cameras will be positioned and directed to avoid intruding into occupied residential or commercial properties.

n. Site plant and facilities will be powered from mains electrical sources where reasonably practicable.

o. The contractor shall promote and enforce ‘good housekeeping’ arrangements on all construction sites to ensure the sites remain clean, tidy and safe. This should include provision of appropriate waste separation facilities.

p. Measures will be implemented to provide effective preventative pest and vermin control and prompt treatment of any pest and vermin infestation. The contractor shall ensure that the risk of infestation by pests and vermin is minimised. Adequate arrangements shall be made for disposing of food waste or other material attractive to vermin. If infestation occurs, the contractor must take action to eliminate the infestation and prevent further occurrence.

q. The contractor shall provide welfare facilities appropriate to the type of site and planned works.

r. Welfare facilities will be connected to mains services and drainage where reasonably practicable. Alternative arrangements will be made when connection to the mains is not possible.

A.4.16 Consideration will be given to the appearance and quality of hoarding around key areas of works, for example at the Burnell Avenue play space, where people are likely to be sensitive to, and curious about, the works. Where reasonably practicable, designs that seek to integrate the hoarding with the surrounding townscape context shall be adopted, with information provided on the purpose and programme of the works to help with awareness among the general public. [PCR 59]

Lighting

A.4.17 The contractor shall provide site lighting to ensure safe working conditions and to maintain security on construction sites, having regard for sensitive wildlife, occupied residential properties, road users, the River Thames and the general public.

A.4.18 Lighting will be positioned and directed so as not to intrude unnecessarily on adjacent buildings and land uses and to avoid unnecessary interference with

local residents or passing transport users (road and river). Lighting design shall be informed by the Guidance Notes for the Reduction of Obtrusive Light, GN01 (Institution of Lighting Professionals, 2021).

A.4.19 Where appropriate, and in discussion with the relevant local authority and police, lighting will be provided to site boundaries and illumination will be sufficient to create a safe route for passing members of the public. Precautions will be taken to avoid site hoardings casting shadows on surrounding footpaths and roads to deter potential street crime.

A.4.20 The lighting design shall consider effects on:

a. Terrestrial ecology, including measures to prevent disturbance to notable species and ecologically sensitive areas. (Further details of measures to protect wildlife are set out in Section A.11: Ecology and landscaping.)

b. The aquatic environment: direct lighting of watercourses shall be avoided, where reasonably practicable, to avoid inhibiting movements of photophobic species such as eel.

Cranes

A.4.21 All cranes will be operated in accordance with the requirements of CAP1096 (Guidance to crane users on the crane notification process and obstacle lighting marking) (Civil Aviation Authority, 2021).

A.4.22 Crane arcs will generally remain within the Order limits. Should it prove necessary for crane arcs to extend beyond the Order limits then this will be agreed with the local authority in accordance with legislation for use of cranes which over-sail the public highway and property owners/occupiers whose air space is affected. The contractor shall obtain the relevant permissions (e.g. licence for use of a crane which over-sails the public highway), in accordance with the relevant legislation, from Transport for London (TfL) or the local authority (as appropriate) for cranes located adjacent to roads. Cranes will be operated in accordance with the requirements of BS7121, Code of Practice for Safe Use of Cranes (BSI, 2006).

Tunnelling

A.4.23 The contractor responsible for tunnelling will be required to follow and adhere to the Association of British Insurers and British Tunnelling Society's Code of Practice for Risk Management in Tunnelling (2024).

Incidents and emergencies

A.4.24 Emergency preparedness procedures shall be prepared and implemented for each site and include the following:

a. Notification procedures for emergency services in the event of an incident

b. The emergency phone number and method of notifying the relevant local authority, statutory bodies including Environment Agency and contact numbers for Thames Water and the contractors' key staff

c. Measures to be taken to reduce risk to life and damage to property

d. Site evacuation procedures

A.4.25 The contractor shall provide and maintain safe site access points suitable for the emergency services, to be developed in consultation with London Ambulance Service, London Fire Brigade, the Metropolitan Police and the relevant local authority emergency planning officer.

A.4.26 The contractor shall ensure that procedures are in place for flood warnings and prepare for a potential flood event relevant to the flood risks at each site. This will include identifying an evacuation route and potential refuge areas in the event of a flood to enable the workforce to leave the site.

A.4.27 The emergency preparedness procedures will include emergency pollution control measures that take account of Environment Agency guidelines.

A.4.28 Procedures shall be implemented for dealing with spillages and pollution. The procedures will contain the following as a minimum:

a. Guidance on the storage and use of hazardous materials with the aim of preventing and containing spills and releases of potentially hazardous material

b. Guidelines on containment that take account of the nature of the materials and the sensitivity of the environment

c. Procedures and appropriate information required in the event of any spill or release

d. Procedures to be adopted in the event of an environmental incident, to contain and minimise any adverse effects

Fire safety

A.4.29 The contractor shall ensure that all construction sites and associated accommodation and welfare facilities have appropriate plans and management controls in place with the aim of preventing fire, including consideration for risks during extreme hot temperatures and vegetated areas adjacent to work sites.

A.4.30 Fire plans and controls shall be developed by the contractor following engagement with the local emergency services and relevant local authority.

Unexploded ordnance

A.4.31 The contractor shall carry out risk assessments for the possibility of unexploded ordnance being found within construction areas in accordance with Construction Industry Research and Information Association (CIRIA) C681 (CIRIA, 2009). [PCR 88]

A.4.32 An emergency response procedure will be prepared and implemented by the contractor to respond to the discovery of unexploded ordnance. This will include evacuation procedures and notifications to the relevant local authorities and emergency services. [PCR 89]

A.5 River works

Cofferdams

A.5.1 During construction and draining of any cofferdams, fish rescue must take place with any fish caught within the cofferdam being returned to the main channel of the River Thames prior to the final drain-down. A suitably qualified ecologist shall be present during draining. [PCR 28]

A.5.2 Any material used for temporary or permanent fill within cofferdams or construction within the foreshore shall be suitable for use within the river environment and shall not cause any potential contamination to the river. Further details regarding the prevention of contamination of water are given in paragraphs A.10.3 to A.10.5.

A.5.3 Flood risk shall be carefully considered when designing and constructing any cofferdams having regard for the measures identified in paragraph A.10.25.

Construction

A.5.4 If there is a need for cofferdams or use of in-river sheet pile walls, the installation methodology shall include methods to reduce noise and vibration where reasonably practicable. [PCR 8]

A.5.5 If in-river percussive piling is used, it shall be carried out with a soft start method to reduce noise and vibration effects where reasonably practicable. The Joint Nature Conservation Committee (JNCC) statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise (JNCC, 2010) shall be followed, as far as this is relevant to the River Thames environment where works are carried out and supervision of the piling activity shall be undertaken by a suitably qualified ecologist. [PCR 27]

A.5.6 The contractor shall design in-river piling to facilitate removal and make reasonable effort to remove all piles completely from the bed of the river upon completion of the works. If this is not possible then they will be cut to a depth below the existing riverbed agreed with the environmental regulators.

A.6 Traffic and transport

General principles of construction transport

A.6.1 The contractor shall undertake the works in such a way as to maintain, as far as is reasonably practicable, existing public access routes and rights of way during construction.

A.6.2 Where potential significant adverse severance impacts on public rights of way are identified, temporary mitigation such as amended pedestrian and cycle routes, and priority crossing infrastructure may be provided where appropriate and reasonably practicable. [PCR 86]

A.6.3 Road safety audits may be carried out to reduce any impacts during construction in accordance with the Design Manual for Roads and Bridges GG 119 Road safety audit process (Highways England, 2020). [PCR 87]

A.6.4 To minimise the impact of construction works, Heavy Goods Vehicles (HGVs) will be routed to and from the strategic road network via local routes using the most direct reasonably practicable designated freight routes. [PCR 83]

A.6.5 Where sections of construction routes fall on roads outside of the London Lorry Control Scheme (LLCS) permitted routes (London Councils, 2025), HGVs are prohibited from using such sections during restricted hours (Monday–Friday from 21:00–07:00 including bank holidays, and Saturday 13:00–Monday 07:00), unless registered to the LLCS and permission is obtained from local councils. It is expected that HGV traffic from the Project will not occur during these restricted hours except for Abnormal Indivisible Loads which are subject to daytime movement restrictions. [PCR 84]

A.6.6 HGV routes will be determined in consultation with relevant local authorities and other stakeholders as appropriate. The contractor will implement these routes and monitor the compliance of HGVs. [PCR 3]

A.6.7 Temporary road markings and parking restrictions may be implemented where appropriate and reasonably practicable so that construction HGVs can safely traverse the local roads to access the major road network. [PCR 82]

A.6.8 HGVs and vans (vehicles of 3.5te Gross Vehicle Weight or less) shall meet the standard of the London Low Emission Zone (LEZ).

A.6.9 HGVs shall meet the Direct Vision Standard requirements or have a Progressive Safety System fitted and be authorised by an HGV Safety Permit issued by TfL.

A.6.10 The construction traffic management plan prepared by the contractor (see paragraph A 6.14, below) will be developed and implemented in line with Construction, Logistics and Community Safety (CLOCS) guidance (CLOCS, 2024). This will address construction vehicle safety, driver competence and compliance with environmental standards, as well as any safety hazards, particularly on local roads approaching the construction sites. [PCR 121]

A.6.11 Any hazardous/contaminated materials shall be handled according to standard practice as set out in The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended).

A.6.12 Waste removal shall be disposed of by authorised waste carriers that are included in the Department for Environment, Food and Rural Affairs (Defra)’s Register of Waste Carriers, Brokers and Dealers.

Traffic management

A.6.13 The contractor shall carry out the works in such a manner as to minimise inconvenience to the public arising from increased traffic flows and disruption from construction traffic, so far as reasonably reasonable.

A.6.14 A construction traffic management plan will be produced and implemented by the contractor. The plan will be prepared in consultation with highway and traffic planning authorities and the emergency services.

A.6.15 The construction traffic management plan will include, by phase:

a. Site boundaries and access/egress points for worksites

b. Temporary closures or diversions of highways

c. A strategy for traffic management such as using parking measures and/or site operatives to manage how construction vehicles enter and exit sites, and how off-site highways works will be planned, implemented, monitored and closed out

d. Local routes to be used by lorries, cranes and abnormal loads generated by construction activity including, where required, the timings of use of such routes, vehicle holding areas, a signage strategy for the routes, means of monitoring lorry use and any prohibited routes

e. An outline schedule and programme of planned traffic management schemes and measures required to complete the works

f. Required bus diversions and bus stop relocations

g. Requirements for amendments to traffic signal infrastructure or timing to be agreed with and implemented by TfL

h. Interfaces with adjacent developments and other project construction sites, including measures to coordinate and reduce combined impacts

i. Arrangements for vehicle management and delivery scheduling

j. Measures to address potential risk to residents and activities on local roads adjacent to construction sites, including (where reasonably practicable and appropriate) notifying suppliers, restricting delivery hours and strictly enforcing speed limits

k. Monitoring and reporting mechanisms for the construction traffic management plan, including frequency of reporting to the relevant planning authority

l. Construction vehicle safety, driver competence and compliance with environmental standards

A.6.16 Improved road markings and parking restrictions on minor roads with direct access to construction sites may be implemented where appropriate and reasonably practicable. This is to prevent construction vehicles from being parked at inappropriate locations that could impact non-motorised users and local residents, and to allow safe unobstructed use by construction vehicles. [PCR 81]

Workforce travel

A.6.17 A construction workforce travel plan will be prepared, based on TfL guidance (TfL, 2025), to help implement any necessary travel demand measures and monitor them for compliance. The plan shall provide for the management of workforce movements to and from the Project worksites and seek to minimise

the impacts of motorised traffic on local residential roads having regard for any relevant safety and environmental standards and adherence to designated routes. [PCR 85]

Road cleanliness

A.6.18 All reasonable measures shall be put in place to limit deposition of mud and other debris on the highway, which will also minimise dust generation.

A.6.19 These measures will have regard to the nature and use of the site and may include:

a. Stockpiles to be managed to prevent their unintended spread
b. Hardstanding at access and egress points that will be cleaned at appropriate intervals
c. Vehicle wash-down points to clean wheels at each egress point
d. Correct loading of vehicles and sheeting of loads where necessary to avoid spillage on the journey
e. Use of sealed vehicles to transport wet materials that otherwise have the potential to leak from the vehicle
f. Use of mechanical road sweepers combined with water sprays to suppress dust and clean site hardstanding, roads and footpaths in the vicinity of the site
g. Flushing of gullies in the vicinity of the site

A.6.20 The contractor is responsible for ensuring that concrete supplies do not spill on journeys to sites and any spills shall be adequately cleaned up.

A.6.21 After completion of any works affecting a highway, all surplus materials will be cleared from the highway, leaving it in a clean and tidy condition in accordance with the requirements of the highway authority.

River traffic

A.6.22 Should river freight transport be proposed the contractor would prepare measures for the management of river transport, in a river transport management plan. This would include method statements and navigational risk assessments to assess risks to recreational and commercial river users and detail mitigation measures including controls over moorings, loading facilities, navigational aids and signage.

A.7 Air quality

Air quality management plan

A.7.1 The contractor will prepare a site-specific air quality and dust management plan before works commence on a site.

A.7.2 The air quality and dust management plan will include:

a. An inventory and timetable of activities which may give rise to emissions or dust

b. The location of sensitive receptors
c. Control measures
d. Compliance monitoring

Dust control measures

A.7.3 The air quality and dust management plan will include good practice air quality and dust control measures, as described in Institute of Air Quality Management (IAQM) 2024 (or as updated) guidance on the assessment of dust from demolition and construction, to be implemented on all worksites where appropriate and reasonably practicable. [PCR 11a]

A.7.4 Construction dust effects will be mitigated proportionally, using the recommendations within the IAQM guidance on the assessment of dust from demolition and construction (IAQM, 2024). The mitigation measures recommended will depend on the level of dust risk identified at sensitive receptors.

A.7.5 The air quality and dust management plan will include standard controls to minimise dust emissions including:

a. Plan site layout so that machinery and dust causing activities are located away from receptors as far as reasonably practicable [PCR 11c]
b. Erect solid screens or barriers around dusty activities or the site boundary at least as high as any stockpile on-site, where reasonably practicable [PCR 11b]
c. Fully enclose site or specific operations as far as reasonably practicable where there is a high potential for dust production and the site is active for an extensive period [PCR 11b]
d. Avoid site run-off of water or mud [PCR 11c]
e. Remove potentially dusty materials from site as soon as reasonably practicable [PCR 11d]
f. Manage stockpiles to prevent wind whipping [PCR 11c]
g. Use cutting, grinding and sawing equipment with dust suppression equipment where necessary and reasonably practicable [PCR 11e]
h. Ensure an adequate supply of water on-site for dust suppressant [PCR 11e]
i. Use enclosed chutes and conveyors and covered skips where necessary and reasonably practicable [PCR 11e]
j. Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use water sprays on such equipment where appropriate [PCR 11e]
k. Ensure equipment is readily available on-site to clean up spillages of dry materials [PCR 11e]
l. No on-site bonfires and burning of waste materials on-site [PCR 11f]
m. Re-vegetate earthworks and exposed areas to stabilise surfaces as soon as reasonably practicable [PCR 11h]

n. Incorporate soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where reasonably practicable, to provide a screen against dust) [PCR 11g]

o. Ensure water suppression is used during demolition operation [PCR 11g]

p. Avoid explosive blasting, using appropriate manual and mechanical alternatives [PCR 11g]

q. Bag and remove any biological debris or damp down such material before demolition [PCR 11g]

r. Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless required for a particular process [PCR 11i]

s. Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored silos with suitable emissions control systems [PCR 11i]

t. Avoid dry sweeping of large areas [PCR 11j]

u. Ensure loaded vehicles entering and leaving site are covered as necessary to prevent escape of materials [PCR 11j]

v. Record inspection of on-site haul routes and any subsequent action, repairing as soon as reasonably practicable [PCR 11j]

w. Install a wheel wash where necessary to dislodge accumulated dust and mud from vehicles leaving site with a hard-surfaced road to the site exit, where site size and layout permits [PCR 11j]

A.7.6 The contractor's dust control procedures shall consider periods of drought.

Vehicle and plant emissions

A.7.7 The contractor shall ensure that the adverse effects of vehicle and plant emissions are controlled using the measures contained within the IAQM 2024 guidance.

A.7.8 As a minimum the following general measures will be employed for minimising emissions and avoiding nuisance:

a. Ensure all vehicles switch off engines when stationary as far as reasonably practicable [PCR 11d]

b. Avoid the use of diesel- or petrol-powered generators where reasonably practicable [PCR 11d]

A.7.9 All non-road mobile machinery (NRMM) must meet the NRMM LEZ standards (Greater London Authority, 2024a). NRMM on all sites within Greater London must meet Stage IV as a minimum and continue to:

a. Review their NRMM register

b. Ensure that all registered NRMM complies with the required standards

c. Log all NRMM between 37 kilowatts (kW) and 560kW

d. All generators must meet Stage V emission standards as a minimum.

e. Where the above NRMM LEZ emission standards cannot be met, or if retrofitting and emissions reduction system is required to meet the standards, an exemption must be applied for meeting the requirements of

the Greater London Authority NRMM LEZ Exemptions and Retrofit Policy (Greater London Authority, 2024b).

Odour

A.7.10 It is not anticipated that the works will give rise to any significant odour impacts but, if necessary, the contractor shall adopt appropriate measures to avoid creating a statutory nuisance or significant loss of amenity due to odours. The air quality management plan shall include odour.

A.7.11 The contractor shall consider the need for controls to be put in place for odour impacts on days with extreme heat that might exacerbate odour from construction activities.

Monitoring

A.7.12 Regular site inspections will be carried out to monitor compliance with the air quality and dust management plan and record results. [PCR 11b]

A.7.13 Site inspection results will be recorded, and an inspection log made available to the relevant local authority when requested.

A.7.14 Site inspections will include regular dust soiling checks of surfaces such as street furniture and cars within 100m of the construction working areas.

A.7.15 Site inspection frequency will be increased during prolonged dry or windy conditions and when activities with high dust potential are being undertaken. [PCR 11b]

A.7.16 Dust monitoring locations will be agreed with the relevant local authority and monitoring will be instigated three months in advance of works commencing in the area. [PCR 11b]

A.7.17 All dust and air quality complaints will be recorded, the causes identified, and appropriate measures taken to reduce emissions in a timely manner. [PCR 11b] The measures taken will also be recorded and the information made available to the relevant local authority on request.

A.7.18 Exceptional incidents will be recorded and action taken to resolve the situation. [PCR 11b]

A.8 Noise and vibration

Control of Pollution Act, Best Practicable Means and local authority consents

A.8.1 Noise generating construction works will be carried out in accordance with Best Practicable Means (BPM) as defined in section 72 of the Control of Pollution Act 1974 (CoPA). [PCR 12]

A.8.2 Where appropriate, Prior Consents under section 61 of CoPA shall be sought from the relevant LPA, which may include noise and vibration limits where relevant. Applications made under section 61 will contain the particulars of the works to be undertaken, the working methods, plant proposed to undertake the

works, relevant noise predictions and the proposed BPM as defined under section 72 of CoPA, to reduce noise and vibration nuisance. [PCR 17]

A.8.3 A Section 61 application may also contain details of any proposed noise and vibration monitoring.

A.8.4 The contractor will develop a site-specific noise and vibration management plan to reduce construction noise and vibration effects at nearby receptors. [PCR 16]

A.8.5 The noise and vibration management plan will cover the following matters:

a. Working hours
b. Procedures for gaining Section 61 consents under CoPA
c. General noise and vibration control measures in accordance with BPM
d. Community liaison in accordance with the community liaison plan, as detailed in Section A.3, including the handing of complaints. This will include:
    i. Notification prior to the start on-site of works which are likely to result in noise impacts or produce vibrations along with details of how long the activity is likely to last
    ii. Site and activity specific noise control measures
    iii. Compliance monitoring

Noise

A.8.6 The good practice control measures set out in BS 5228-1:2009 +A1:2014 (BSI, 2014a) would be implemented where appropriate and reasonably practicable to reduce construction noise levels. [PCR 13] These include the following example measures:

a. Electrical supplies to work sites provided by mains electrical supply where reasonably practicable, with generators only used for emergencies or where mains power is not reasonably practicable such as during site set up or on remote sites [PCR 13a]
b. All plant and equipment to be properly maintained and operated in accordance with manufacturers' recommendations and in such a manner as to avoid causing excessive noise [PCR 13a]
c. Stationary equipment, e.g. pumps, compressors, generators, to be situated as far as reasonably practicable from receptors and, where appropriate, acoustic screens erected around them [PCR 13a]
d. Equipment known to emit noise strongly in one direction orientated so that noise is directed away from noise sensitive areas where reasonably practicable [PCR 13a]
e. Using screening around equipment, positioned at the correct height to provide effective screening, where reasonably practicable and maintaining plant in good operational condition with noise control measures as provided in place [PCR 13a]
f. Equipment to be shut down when not in use [PCR 13a]

g. Particularly noisy equipment to be fitted with mufflers or silencers of the type recommended by the manufacturers [PCR 13a]

h. Care to be taken when loading and unloading vehicles, e.g. minimising drop-heights [PCR 13a]

i. Start-up and run-down of vibratory rollers to be carried out at the furthest reasonably practicable area of the site from nearby sensitive receptors [PCR 13a]

j. No vehicles to wait or queue on public highways with engines running where reasonably practicable [PCR 13a]

Vibration

A.8.7 Measures to minimise vibration impacts during construction will include the implementation of BPM in accordance with BS 5228-2:2009 +A1:2014 (BSI, 2014b) in order to:

a. Avoid adverse effects on vibration-sensitive equipment

b. Minimise disturbance to residents and other users of buildings near the works

c. Protect buildings from physical impacts where it is not reasonably practicable to avoid very high levels of vibration

Monitoring

A.8.8 The contractor will undertake and record noise and vibration levels where necessary to assure and demonstrate compliance with noise and vibration commitments. This information will be made available to the relevant LPA on request, and will:

a. Satisfy the requirements of consent obtained under CoPA Section 61

b. Provide confidence in the calculations undertaken to inform the CoPA Section 61 process

c. Monitor compliance with agreed noise and vibration limits

d. Inform responses to complaints about noise and vibration

A.8.9 Noise measurements are to be undertaken at regular intervals by suitably qualified and experienced personnel.

A.8.10 Where monitored noise or vibration levels are found to be above the limits set the following actions will be undertaken:

a. Review works likely to be causing a breach and consider mitigation

b. Confirm monitored noise levels

c. Determine exceedance

d. Implement reasonably practicable measures

e. Continue monitoring

A.9 Materials and waste

Site waste management plan

A.9.1 The contractors will develop and implement a site waste management plan (SWMP) for the sustainable management of waste. [PCR 74]

A.9.2 The SWMP will identify the following:

a. Responsibilities within the construction team for waste management

b. The specific types and quantities of waste likely to arise

c. Classification of waste in accordance with the statutory controls governing the management of inert, non-hazardous and hazardous waste

d. Measures to be adopted during construction to minimise waste generated

e. Opportunities for recycling and/or reuse

f. Proposed treatment and disposal sites together with details of their Environmental Permit

g. Provisions for staff training and use of the SWMP

A.9.3 The design for the Project shall follow the waste hierarchy by reducing waste generation, increasing the recycling or recovery of waste where reasonably practicable, and reducing the need for waste disposal where reasonably practicable. [PCR 70]

A.9.4 Designated on-site storage space for waste shall be provided, to allow waste segregation (e.g. separating construction materials for potential future use, separating hazardous waste from non-hazardous, etc.) and preventing uncontrolled waste spillage. On-site hazardous excavated material or waste will be kept separate from other materials and removed and managed in accordance with legislative requirements. [PCR 77]

A.9.5 The SWMP will record each movement of waste (including the reuse or recycling of materials on-site) in accordance with The Waste (England and Wales) Regulations 2011 (and its amendments) and the arrangements for auditing the actions of other parties in the waste handling chain.

A.9.6 The contractor will implement standard good practice waste measures such as:

a. Managing waste according to waste legislation requirements, e.g. sending waste only to licensed/permitted facilities and by licensed contractors [PCR 78]

b. Reducing waste by requiring suppliers to take away packaging materials in compliance with the Packaging Extended Producer Responsibility Regulations (Defra and Environment Agency, 2025)

c. Extending materials life by appropriate design and procurement decisions to reduce the need for new replacement materials and therefore reducing waste generation [PCR 78]

d. Implementing an appropriate approach to import of materials that reduces the risk of unusable surplus materials that would need to be discarded as waste [PCR 78]

e. Identifying reusable materials for reuse on-site, storage or resale [PCR 78]

f. Exploring opportunities for using surplus recycling or recovered materials in local community projects where reasonably practicable, e.g. using recycled mulch from tree felling at community facilities [PCR 78]

g. Prevention of waste and construction materials spillage onto the streets, which is especially important considering the urbanised location of the Project. Vehicles with closed trailers should be considered to avoid any weather interference with waste transportation. [PCR 78]

A.9.7 The contractor shall seek to achieve the following measures as far as reasonably practicable:

a. Recovery of at least 70% of non-hazardous Construction and Demolition Waste (CDW) generated during the construction, in line with the Waste Management Plan for England (Defra, 2021) [PCR 79]

b. Reuse/recycling/recovery of at least 95% of CDW, in line with the London Plan (Greater London Authority, 2021) [PCR 79]

c. 95% of inert excavation arisings to be beneficially used, in line with the London Plan [PCR 79]

d. No biodegradable or recyclable waste landfilled after 2026, in line with the London Plan [PCR 79]

Materials management

A.9.8 The contractor shall develop and implement a materials management plan (MMP) with provision for handling of excavated materials including soils, so they can be reused on- or off-site. The MMP shall be produced in accordance with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Site (Defra, 2009). [PCR 33]

A.9.9 The MMP will include ways to:

a. Use sustainably sourced materials (e.g. Forest Stewardship Council or Programme for the Endorsement of Forest Certification certified timber (Forest Stewardship Council, 2024; Programme for the Endorsement of Forest Certification, 2023))

b. Minimise the use of materials that have the potential to harm human health or the natural environment

A.9.10 Imported materials shall be sought with high recycled content where reasonably practicable, to reduce the need to use primary resources, unless incompatible with design and safety specifications. [PCR 71]

A.9.11 Pre-cast modules shall be used in preference to *in situ* concrete where reasonably practicable as pre-cast forms are less likely to result in waste generation. [PCR 72]

A.9.12 Topsoils and subsoils disturbed during construction shall be carefully stripped and protected so that that they may be reused, where reasonably practicable, either within the Project for site restoration or elsewhere. [PCR 32]

A.9.13 Soil stockpile heights would be as set out in accordance with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009) and would be kept as low as reasonably practicable. [PCR 100]

A.9.14 The contractor shall comply with all legal 'duty of care' requirements to protect the interests and safety of others from the potential effects of handling, storing, transporting and depositing excavated materials and demolition/construction wastes arising from the Project. Such compliance will include implementing and monitoring accepted industry practices for the control of dust, mud and other debris onsite. The guidance set out in the Waste Management – The Duty of Care, Code of Practice (Her Majesty's Stationery Office March 1996) (except where superseded by changes to waste law made since issue of this Code of Practice in 1996) will be followed, in addition to obligations under The Waste (England and Wales) Regulations 2011.

A.9.15 Excavated arisings shall be reused on-site as far as reasonably practicable to reduce the necessity to import materials to site and to reduce excess excavated arisings that would need to be managed off-site. It is noted that such opportunities at the Project are limited; however, some proportion of excavated arisings might be reused on-site. [PCR 73]

A.9.16 Where excavated arisings cannot be reused on-site, reuse of those materials shall be sought locally as far as is reasonably practicable. Where it is not possible to reuse the material locally, other sites, at greater distances, requiring material for beneficial use shall be sought where reasonably practicable. [PCR 73]

Circular economy

A.9.17 A Circular Economy Statement (CES) will be developed to capture circular economy solutions. [PCR 76] The CES will be prepared in line with the Greater London Authority London Plan Policy S17 and Circular Economy Statement Guidance (Greater London Authority, 2025).

A.9.18 The contractor will apply circular economy principles in their approach to the work and procurement of materials. These are:

a. Eliminate waste and pollution
b. Circulate products and materials (at their highest value)
c. Regenerate nature

A.9.19 The contractor will store arisings on-site segregated by material types to avoid cross contamination and retain the value of different types of aggregates.

A.9.20 The contractor will consider the use of construction materials and products with circular economy certifications or from secondary sources wherever suitable. In

selecting plant and equipment, opportunities will be sought to use products such as circular certified site cabins.

A.10 Ground and surface water

A.10.1 The contractor shall implement working methods to protect surface water and groundwater from pollution and other adverse impacts, including changes to flow, flood storage volume, water levels and water quality.

A.10.2 The contractor shall develop and implement a site-specific water management plan prior to the commencement of relevant works at that site. The plan shall set out the following in order to protect surface and ground water quality during construction:

a. Areas at risk of water pollution from surface water run-off or other pollution sources including chemical or fuel storage
b. Silt management measures
c. Measures to prevent pollution
d. Spill response procedures
e. Temporary limits on water quality discharges from construction sites specified in any Environmental Permit issued by the Environment Agency and measures to ensure compliance with any required permits or consents
f. Flow and water quality management requirements for dewatering to be agreed and permitted by the Environment Agency
g. Any land drains that may be disrupted during the construction phase
h. Measures to avoid and minimise potential impacts on the Project from flooding and to ensure flood risk is not increased elsewhere

Pollution prevention

A.10.3 The contractor shall adhere to CIRIA guidance including:

a. CIRIA (2001) C532: Control of water pollution from construction sites
b. CIRIA (2014) C736: Containment systems for the prevention of pollution
c. CIRIA (2023) C811: Environmental good practice on-site [PCR 54]

A.10.4 Standard good practice measures shall be implemented during construction to prevent pollution:

a. Chemicals, fuels and oils shall be stored in secure containers or bunded areas to prevent leaks or spills from reaching water sources. [PCR 54b]
b. Any oil stored within 10m of a watercourse shall be securely contained and provided with secondary containment such as bunding. [PCR 103]
c. Refuelling of plant material, greasing or oiling shall only take place over impermeable surfaces with sealed drainage or oil interceptor with no connection to watercourses. [PCR 54b]

d. Impermeable liners or barriers shall be used to protect groundwater from contamination from site activities, such as during the storage or disposal of hazardous materials. [PCR 54b]

e. Water management plans shall be implemented for surface water runoff and groundwater to ensuring that pollutants are removed before discharge. [PCR 54b]

A.10.5 In-river works shall be undertaken using appropriate engineering methods, which could include the use of sheet piled areas for cofferdams where reasonably practicable, to reduce impacts on water quality. [PCR 47]

A.10.6 Water generated through construction activities including water from excavation and dewatering is expected to require settlement or other treatment prior to disposal or discharge. This will require careful planning with consideration for receptors at each site or setting and may be subject to Environment Agency permit. [PCR 54a]

Groundwater protection

A.10.7 Groundwater controls, where required to minimise the ingress of water to any shafts or excavations below the groundwater table, will be undertaken in accordance with Environment Agency abstraction licence and/or discharge permit requirements. [PCR 106]

A.10.8 Construction methodology for the conveyance route shafts will include groundwater and surface water controls to avoid the cross contamination of groundwater. [PCR 45]

A.10.9 The contractor shall avoid using materials that could result in direct or indirect discharge of hazardous substances or non-hazardous pollutants to groundwater.

A.10.10 If bentonite is required during construction of the conveyance route and TLT connection, injected volumes will be closely monitored to limit losses to the surrounding ground. The density of any grout used will be varied appropriately to ensure it does not leak into the aquifers, minimising risks of contamination. [PCR 43]

A.10.11 Any historical or recent boreholes which have been drilled directly along the route of the conveyance or pipeline will be backfilled and sealed ahead of the construction phase commencing, to limit potential contamination pathways to the aquifer. [PCR 114]

Excavations and dewatering

A.10.12 Monitoring arrangements for dewatering will be set out in a water management plan.

A.10.13 The following provisions will apply to any dewatering activities:

a. Records of water pumped (volume and quality to sewer and/or watercourse) will be kept at all dewatering sites as required under the terms of any required permit.

b. Any groundwater or surface water intercepted from excavations will be pumped out and passed through an appropriate form of treatment (such as settlement equipment) before being discharged to an approved location. [PCR 54a]

c. Discharge rates, the location of discharge points and monitoring requirements shall be agreed with the relevant statutory undertaker or the Environment Agency as appropriate prior to any dewatering.

A.10.14 As stated in paragraph A.10.6, any water generated through construction activities is expected to require settlement or other treatment prior to disposal.

Site drainage

A.10.15 A temporary drainage system will be installed at all construction sites to manage surface water runoff. [PCR 53]

A.10.16 The relevant sections of British Standard 6031: Code of Practice for Earthworks (BSI, 1981) for the general control of site drainage will be followed.

A.10.17 Water flows from sites will be limited during construction to existing run-off rates, unless otherwise agreed with the Environment Agency, in accordance with relevant legislation.

A.10.18 For discharges to mains foul or combined sewers, relevant permissions shall be obtained from the statutory undertaker. Discharge to watercourses will only be permitted where permits or other relevant approval has been obtained.

A.10.19 The contractor shall ensure that site drainage meets the effluent and flood risk standards required by the sewerage undertaker and Environment Agency, as appropriate, in accordance with the relevant permit and will provide and maintain holding or settling tanks, separators and other measures, as required. The contractor shall ensure that access is provided to the undertaker and Environment Agency so that samples of discharges can be obtained and analysed and flows verified, as required.

Flooding

A.10.20 A flood response plan will be developed for the flood risk management and evacuation response during construction phases at each site within Flood Zones 2 and 3 as set out in Volume 3, Appendix 5.2: Flood Risk Assessment (FRA). [PCR 111]

A.10.21 Where compounds are required to be located within Flood Zones 2 and 3, construction design should aim to locate the most flood sensitive equipment, facilities or materials storage in the areas of lowest flood risk or provide additional flood mitigation measures to manage on-site and off-site flood risk over the duration of the construction period accounting for the appropriate climate change allowance for each area as detailed in the FRA. [PCR 112]

A.10.22 Should there be a flood event, affected infrastructure must be inspected and repaired when considered safe to do so. When it is safe to re-enter the site, the site can be opened, and construction staff can return to the work. [PCR 113]

A.10.23 Temporary welfare facilities proposed at the Ham Playing Fields site will be raised above the design flood level with consideration for freeboard and climate change allowances set out in the FRA. [PCR 107]

A.10.24 A barrier around the shaft at the Ham Playing Fields site, or other measures to prevent flood water ingress into the shaft during construction, will be installed above the design flood level with consideration for freeboard and climate change allowances set out in the FRA. [PCR 108]

A.10.25 Finished crest levels of cofferdams, if required, at the Burnell Avenue site shall be set in line with the parameters outlined in the FRA, maintaining an appropriate freeboard above the modelled defended or undefended flood levels as agreed with the Environment Agency for each area. [PCR 109]

A.11 Ecology and landscaping

Protection of trees

A.11.1 A retained and removed vegetation plan will be developed, identifying vegetation within the Order limits that may be removed during construction and that which must be protected and retained. This includes trees subject to Tree Preservation Orders (TPOs) and trees within Conservation Areas.

A.11.2 Existing vegetation within the Order limits, including temporary works areas, shall be retained as far as reasonably practicable. Particular attention shall be given to the retention of mature vegetation including the following:

a. Trees subject to TPOs

b. Trees within Conservation Areas

c. Category A and B trees (as defined by BS 5387:2012: Trees in relation to design, demolition and construction – Recommendations (BS 5837: 2012) (BSI, 2012)) [PCR 36]

A.11.3 Retained trees would be protected in line with BS 5837 2012: Trees in relation to design, demolition and construction – Recommendations (BS 5837: 2012) (BSI, 2012). [PCR 37]

A.11.4 Works to trees subject to TPOs shall be supervised by an Ecological Clerk of Works and supported by an experienced arboriculturist. In the event that tree canopy pruning is required to facilitate the works, this would be undertaken by suitable qualified and experienced staff working to BS 3998:2010 Tree work – Recommendations (BSI, 2010). [PCR 98]

A.11.5 An arboricultural method statement and tree protection plan shall be prepared to support the final design and implemented prior to commencement of works affecting trees. The arboricultural method statement and tree protection plan shall identify areas of special measures to protect and retain features that will be subject to encroachment and localised removal. This will be based on the special measure areas, construction exclusion zones and outline tree protection measures presented within the Arboricultural Impact Assessment. [PCR 99]

A.11.6 Routes of final utility diversions and methods of construction shall be selected to retain as much existing vegetation as reasonably practicable, in particular mature trees, subject to the agreement of the utility asset owner. [PCR 97]

Protection of habitats and species

A.11.7 Construction works will be carried out in such a way as to make sure that disturbance to terrestrial and aquatic ecological receptors is controlled, appropriate measures are in place to protect the ecology of these areas and to avoid impacts on protected species in accordance with relevant good practice and legislative requirements.

A.11.8 The contractor shall implement a programme of monitoring, supervised by an Ecological Clerk of Works, to review the status of ecological issues during construction, including the monitoring and maintenance of any measures implemented as part of any advanced mitigation works.

A.11.9 The contractor shall take reasonably practicable measures to minimise harm to and disturbance of wildlife caused by noise and vibration, dust and other air pollution, to consider the impact on wildlife when erecting site lighting and to provide construction staff with training on how to avoid damaging site ecology during construction.

A.11.10 A suitably qualified ecologist will carry out site checks for notable and protected species and habitats immediately prior to site clearance. A suitably qualified ecologist will be present to observe clearance activities to confirm the presence or absence of protected species. They will ensure unanticipated discoveries of notable flora and fauna are appropriately dealt with and to ensure legal compliance.

A.11.11 Works exclusion buffer zones and stand-off distances from sensitive ecological receptors such as designated sites, confirmed bat roosts, badger setts, suitable stag beetle habitat, bird nests and watercourses shall be implemented as appropriate. These works exclusion buffer zones will be demarcated using physical barriers such as Heras style fencing to prevent encroachment of works and where necessary signage will also be attached to barriers. [PCR 19c]

A.11.12 Licences may be provided by Natural England for works that would otherwise contravene current UK or European wildlife legislation. All construction works will be undertaken in accordance with the relevant mitigation strategies and conditions of those licences. [PCR 20]

A.11.13 The following good practice measures shall be implemented during construction where reasonably practicable:

a. Ecological features shall be retained where reasonably practicable, such as by siting temporary compounds, laydown areas and access in areas of least ecological sensitivity (for example, areas of hardstanding and modified grassland). [PCR 19a]

b. Clearance and/or disturbance of habitats within above ground sites would be conducted under the supervision of a suitably qualified ecologist. [PCR 19a]

c. Where reasonably practicable, works shall be timed to mitigate potential impacts on protected or ecologically significant species, for example: to avoid removal or disturbance of any nesting bird habitat during the bird breeding season (generally between 1 March and 31 August inclusive); avoiding removal of habitats that may support hibernating species during the hibernation season. [PCR 19a]

d. The creation of features which could attract wildlife into works areas shall be avoided. For example, stockpiling of large earth piles in areas of known badger activity shall be managed to prevent the excavation of new setts. [PCR 19b]

e. Important commuting features such as mammal pathways and river channels shall be kept clear of obstruction so that habitat connectivity is maintained across the site and mobile species such as badgers are able to continue to forage within their normal range, outside of restricted works areas, and maintain healthy populations throughout the construction period. [PCR 19b]

f. Any trenches, trial pits and excavations shall be covered overnight or appropriately fenced off, where reasonably practicable, in order to prevent animals falling in and becoming trapped. Where excavations, cannot reasonably be closed or backfilled on a nightly basis or securely fenced, a means of preventing animal entry or facilitating escape shall be provided. [PCR 19b]

A.11.14 Sensitive lighting strategies shall be implemented where reasonably practicable which will avoid directly lighting ecological receptors where disturbance effects could arise and minimising light spill onto the receptors by use of shielding and directional lighting. Light intensity shall be reduced where reasonably practicable and where a higher light intensity is required these works shall be scheduled to daylight hours where reasonably practicable. [PCR 19d]

A.11.15 Any unavoidable removal of fox dens or rabbit burrows shall be undertaken sensitively by hand. All excavation of dens and burrows will be supervised by a suitably qualified and experienced ecologist. [PCR 21]

A.11.16 Pre-construction surveys shall be undertaken for bats, badgers, and stag beetles to confirm status within above ground sites (and appropriate buffers areas). Such surveys may also include hazel dormouse, otter, water vole and two-lipped door snail depending on further survey results, to be confirmed in the ES. [PCR 22]

Protection of fish and aquatic mammals

A.11.17 If in-river percussive piling is used, it shall be carried out with a soft start method to reduce noise and vibration effects where reasonably practicable. The JNCC statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise (JNCC, 2010) shall be followed, as far as this is relevant to the River Thames environment where works are carried

out and supervision of the piling activity shall be undertaken by a suitably qualified ecologist. [PCR 27]

A.11.18 A suitably qualified ecologist would be present during any dewatering activities. During construction and dewatering of any cofferdams, fish rescue would take place, and any fish caught within the cofferdam would be returned to the main channel of the River Thames prior to the final drain-down [PCR 28]

A.11.19 If it is determined that percussive piling is required for in-river works, then avoiding sensitive timings for fish will be considered. This shall have regard for the timing and duration of the works. Restrictions on the timing of pile driving activities shall be agreed with the Environment Agency. [PCR 117]

Biosecurity and invasive species

A.11.20 Care will be taken to control and prevent the spread of invasive non-native species. For example, works exclusion buffer zones around stands of invasive plant species will be installed and specialist contractors will be brought in to remove and legally dispose of the cut waste materials, where required. [PCR 23]

A.11.21 Prevention measures, such as biosecurity protocols, shall be implemented to reduce the spread of invasive non-native species during construction. [PCR 24]

Landscape reinstatement

A.11.22 A landscape and ecology management plan will be produced detailing how landscape and ecology mitigation and management will be delivered. [PCR 104]

A.11.23 All land used temporarily shall be restored and returned to an appropriate condition relevant to its previous use wherever reasonably practicable and appropriate, including the ripping, minor regrading and re-spreading of topsoil. Walls and other features shall be reinstated to a similar style and quality to any that were removed with landowner agreement. [PCR 94]

A.11.24 Soil stockpile heights would be as set out in accordance with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009) and would be kept as low as reasonably practicable. [PCR 100]

A.11.25 Where it would be necessary to remove vegetation within temporary works areas, such as construction compounds, access roads and areas allocated for the stockpiling of materials, this shall be replaced on completion of construction using the same or similar species to that removed where reasonably practicable subject to planting over and around easements and utilities, and consideration of species with regards to climate change, and resilience to pests and disease, and landowner agreement. [PCR 94]

A.11.26 Where it is necessary to remove trees subject to TPOs or within Conservation Areas, they shall be replaced on completion of construction using the same or similar species to that removed as close to the location of the original as

reasonably practicable, subject to consideration of species with regard to climate change and resilience to pests and disease. [PCR 93]

A.11.27 The supply, storage, handling, planting and maintenance of proposed planting shall be undertaken in accordance with relevant British Standards, including BS 4428:1989 Code of Practice for General Landscape Operations (Excluding Hard Surfaces) (BSI, 1989). [PCR 40]

A.11.28 A five-year aftercare period shall be adopted for all soft environmental features of the Project with monitoring of condition and replacement planting of vegetation that has died or failed to establish. [PCR 96]

A.11.29 The Project has committed to achieving a minimum 10% BNG. This net gain in biodiversity is measured as a Project-wide minimum 10% increase in 'habitat units' as measured by the Defra's Biodiversity Metric calculation tool version 1.0.3. To achieve this commitment, the objectives are for the Project's BNG to:

a. Provide year-round resources for species of local ecological value
b. Support Local Nature Recovery Strategies
c. Seek to be resilient to future climate risks
d. Benefit communities local to the Project [PCR 25]

A.12 Historic environment

Archaeological mitigation strategy

A.12.1 The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity (whether visible, buried or submerged) including landscaped, planted and managed flora.

A.12.2 A programme of archaeological mitigation may be required, subject to the findings of future assessment and field evaluation, at the Ham Playing Fields and Burnell Avenue main works sites where groundbreaking will be undertaken. [PCR 92]

A.12.3 Before works commence on-site an Archaeological Mitigation Strategy (AMS) will be produced. The scope of the archaeological mitigation will be developed with the Greater London Archaeology Advisory Service and detailed in the AMS document and supporting Outline Written Scheme of Investigation (WSI). Site specific WSI(s) shall then be prepared in advance of the mitigation works being undertaken either in advance of, or during, construction activities. [PCR 92]

Protection of known assets

A.12.4 Where designated heritage assets are present in close proximity to work sites, the contractor shall implement protection measures, such as speed limits, cones and signage, to reduce the risk of accidental damage. Specific assets may be subject to monitoring to ensure that they will not be affected by noise or vibration. [PCR 90]

Unexpected finds

A.12.5 A protocol for unexpected archaeological discoveries will be implemented to allow for archaeological remains outside of identified areas of specific mitigation to be appropriately investigated and recorded if they are encountered during construction activities. [PCR 91]

A.13 Ground conditions and contaminated land

Site investigation and remediation

A.13.1 The Project will be designed, as far as reasonably practicable, to avoid land stability issues and risk of encountering collapsible ground, high sensitivity/value soils and geological receptors, and areas where potential land contamination has been identified. [PCR 29]

A.13.2 The contractor shall undertake an investigation and assessment of potential land contamination in accordance with relevant standards and best practice guidance.

A.13.3 Where contamination impacts are identified during ground investigations or construction, remediation strategies will be developed, as relevant and appropriate to the nature and extent of contamination encountered and agreed with the relevant LPAs and the Environment Agency. [PCR 30]

Unexpected contamination

A.13.4 Good practice protocols shall be implemented at construction sites to limit the potential for mobilisation of contamination, and to limit potential contamination of soil, surface and groundwater, for example from accidental leaks or spills of fuels or chemicals. [PCR 34]

A.13.5 The site induction for construction workers will include a section on the potential for encountering contaminated materials on-site and the risks that such materials may pose to workers or others. Training will be given on the identification of potentially hazardous materials and a reporting procedure set up for any event in which suspect substances are encountered.

A.13.6 The contractor shall ensure that the works are routinely monitored for contamination, e.g. the presence of odours, unusual staining, oily, tarry or fibrous materials. In the event that contamination is suspected, works in the immediate area will be made safe and secure. A contaminated land specialist shall inspect the site and, where deemed necessary, arrange for sampling and laboratory testing of soils or liquids. Further risk assessments to receptors shall be carried out as necessary and reported to the local authority and the Environment Agency.

A.13.7 Should unacceptable risks be identified, the contractor shall agree a remediation method statement with the local authority, in consultation with the Environment Agency.

Asbestos

A.13.8 The contractor shall take specific precautions if materials containing asbestos are present or encountered during works, in order to comply with The Control of Asbestos Regulations 2012.

A.14 Carbon and energy

A.14.1 The contractor shall put in place measures to minimise energy consumption and carbon emissions during construction. These will include:

a. Measures to reduce energy usage

b. Monitoring, reporting and setting of targets for carbon dioxide arising from site activities and from transportation

c. Consideration of energy efficiency in the procurement, maintenance and use of construction plant

d. Consideration and assessment of energy from renewable and/or low emission sources to be used during construction

A.14.2 A carbon and energy management plan will be developed to align with the principles of PAS:2080 Carbon Management in Buildings and Infrastructure (BSI, 2023) and will include:

a. A defined whole life carbon baseline and level of ambition for carbon reduction

b. Identification of carbon ‘hotspots’ and potential carbon reduction opportunities which will be taken forward for further investigation

A.15 Next steps

A.15.1 This draft CoCP will be updated to take account of additional mitigation measures identified as the Project is further developed in iteration with the ongoing EIA and having regard for feedback from consultation.

A.15.2 An updated version of the CoCP will be made publicly available as part of the DCO application documentation.

A.16 References

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