

Paper Mill Lane Works

Code of Construction Practice Appendix 4 Air Quality Monitoring Plan DCO Requirement 22 (2) (e)

(Applicable to Work Numbers 50 and 51)

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Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
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2	16/12/21	Ben Turner	Phil Rew-Williamson	Gareth Mills
3	01/04/22	Jamie Munro	Phil Rew-Williamson	Gareth Mills

Description of Revisions			
Rev	Page	Section	Description
1	ALL	ALL	New Document
2	ALL	ALL	Amended in accordance with consultee comments on Interim Draft (MSDC, 22/09/21) and also to include detailed air quality assessment
3	ALL	ALL	Issued for discharge with minor amendments. No comments were received from stakeholders on the Final Draft document

FOR DISCUSSION

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FIGURE LIST

Figure 1 Site Context Plan

Figure 2 Air Quality Sensitive Areas

FOR DISCHARGE

1. INTRODUCTION AND SCOPE

1.1. PROJECT OVERVIEW

1. East Anglia Three Limited (EATL) was awarded a Development Consent Order (DCO) by the Secretary of State, Department of Business, Energy and Industrial Strategy (DBEIS) on 7 August 2017 for the East Anglia THREE Offshore Windfarm (EA THREE). The DCO granted consent for the development of a 1,200MW offshore windfarm and associated infrastructure and is live until 28 August 2022. The DCO has now been subject to three non-material variations:
 - In March 2019 EATL submitted a non-material change application to DBEIS to amend the consent to increase the maximum generating capacity from 1,200MW to 1,400MW and to limit the maximum number of gravity base foundations to 100. In June 2019 DBEIS authorised the proposed change application and issued an Amendments Order.
 - In July 2020 EATL submitted a second non-material change application to DBEIS to amend the parameters of its offshore substations (reducing the number of these to one) and wind turbines (a decrease in the number of turbines and an increase in their hub height and rotor radius). On 15 April 2021 DBEIS authorised this proposed change application and issued an Amendments Order.
 - In August 2021 EATL submitted a third non-material change application to DBEIS to amend the consent to remove the maximum generating capacity of 1,400MW and to amend the parameters of its wind turbines (a decrease in the number of turbines and an increase in their hub height and rotor radius). The application is currently in the consultation phase.
2. The onshore construction works associated with EA THREE will have a capacity of 1400MW and transmission connection of 1320MW. The construction works will be spread across a 37km corridor between the Suffolk coast at Bawdsey and the converter station at Bramford, passing the northern side of Ipswich. As a result of the strategic approach taken, the cables will be pulled through pre-installed ducts laid during the onshore works for East Anglia ONE Offshore Windfarm (EA ONE), thereby substantially reducing the impacts of connecting to the National Grid (NG) at the same location. The infrastructure to be installed for EA THREE, therefore, comprises:
 - The landfall site with one associated transition bay location with two transition bays containing the connection between the offshore and onshore cables;
 - Two onshore electrical cables (single core);
 - Up to 62 jointing bay locations each with up to two jointing bays;
 - One onshore converter station, adjacent to the EA ONE Substation;
 - Three cables to link the converter station to the National Grid Bramford Substation;
 - Up to three onshore fibre optic cables; and
 - Landscaping and tree planting around the onshore converter station location.

1.2. SCOPE

3. This Employer's Air Quality Monitoring Plan (AQMP) sets out the monitoring and mitigation measures to be applied to the construction of EA THREE Paper Mill Lane Works, to ensure that any potential unmitigated effects are minimised, and where possible, removed. This AQMP is submitted as an appendix to the Code of Construction Practice (CoCP) and fulfils DCO Requirement 22 (2) (e) which states:

22.—(2) The code of construction practice must include (...)
(e) an air quality monitoring plan
1. The scope of this document relates to the construction of the Paper Mill Lane Works, as part of the onshore cable route that runs from the landfall location at Bawdsey to the Converter Station works located near Bramford, Suffolk. The works in this stage comprise Work No.s 50 and 51 (See Figure 1 Site Context Plan). AQMPs have been produced for each stage of the onshore works and are provided under separate cover. The Principal Contractor will develop their own detailed AQMP in accordance with this Employer's AQMP.
2. The Paper Mill Lane Works will be some of the first works to be undertaken along the cable route. These works have been designated as a stage in their own right to allow the works to commence at this location prior to works commencing along the cable route as a whole (i.e. the main cable works construction phase). The Construction Consolidation Site (CCS) and access to it will be constructed in Summer 2022 with the remaining works (comprising jointing bay installation, cable installation, reinstatement and the access and trackways to the HDD duct proving excavations) will be undertaken as part of the main cable works construction phase.

3. The purpose of this AQMP is to set out the implementation of the appropriate control measures and mitigation to minimise the adverse environmental effects during the construction of the Paper Mill Lane Works. The AQMP also provides the framework of the monitoring plan to evaluate the efficiency of applied control measures and mitigation. It covers all phases of the construction process and takes into account the work of the Principal Contractors and subcontractors.
4. The following objectives have been identified in terms of air quality management for the Paper Mill Lane Works:
 - Release of dust/particulate matter must not cause an environmental nuisance at any human or ecological receptor;
 - No justified complaints received regarding excessive dust generation or air pollution, as a result of construction activities;
 - Ensure exhaust emissions of the plant and equipment used in construction activities are controlled;
 - Monitor and maintain dust controls throughout the construction of the onshore elements;
 - Monitor the effects of all activities on air quality and the effectiveness of mitigation measures;
 - Limit the disturbed area and reinstate as soon as practicable, following the completion of works;
 - Ensure all personnel are appropriately trained in environmental awareness; and
 - No environmental fines or prosecutions relating to dust and air quality.
5. Potential dust impacts during the construction of the Paper Mill Lane Works are considered to be temporary in nature and short-term. The impacts are determined to be temporary as they will only potentially occur throughout the construction phase (approximately 2 years) and short-term because these will only arise at particular times when certain activities and meteorological conditions coincide.
6. Any risks associated with potential contaminated land are addressed in Section 11 of the Code of Construction Practice (of which this is an appendix), and as such are not covered within this plan.
7. The information contained herein shall be adhered to by the appointed Principal Contractors and subcontractors and implementation and compliance will be monitored by the Construction Management Team. These measures will only be revised with the agreement of Mid Suffolk District Council (MSDC).

2. ABBREVIATIONS

AQAL	Air Quality Assessment Level
AQMA	Air Quality Management Area
AQMP	Air Quality Monitoring Plan
AQO	Air Quality Objective
AQS	Air Quality Strategy 2007
CLO	Community Liaison Officer
Defra	Department for Environment, Food and Rural Affairs
DPF	Diesel Particulate Filters
EnvCoW	Environmental Clerk of Works
EPA	Environmental Protection Act 1990
EPUK	Environmental Protection UK
ES	Environmental Statement
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
IBC	Ipswich Borough Council
IBR	Scottish Power / Iberdrola Renewables Offshore
LAQM	Local Air Quality Management
MSDC	Mid Suffolk District Council
NRMM	Non-Road Mobile Machinery

NO₂	Nitrogen Dioxide
PCCS	Primary Construction Consolidation Site
PM_{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometres
PM₁₀	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometres

3. LEGISLATION, GUIDELINES, BEST PRACTICES AND STANDARDS

3.1. Legislation

8. This section includes the relevant legislation in place that is used to control dust and emissions, in this case from the onshore construction activities.

- Clean Air Strategy 2019;
- Clean Air Act 1993;
- Environmental Protection Act (EPA) 1990;
- Environment Act 1995, Section 82; and
- UK Air Quality Strategy (AQS) 2007.

3.1.1. Air Quality Strategy

9. The ambient air quality standards of relevance to human receptors (as prescribed within the AQS) are set out in Table below.

Table 3-1 Relevant Air Quality Objectives (AQOs)

Pollutant	Standard (µg/m ³)	Measured As
Nitrogen Dioxide (NO ₂)	40	Annual mean
	200	1-hour mean (not to be exceeded on more than 18 occasions per annum)
Particles (PM ₁₀)	40	Annual mean
	50	24-hour mean (not to be exceeded on more than 35 occasions per annum)
Particles (PM _{2.5})	25	Annual mean

3.1.2. Local Air Quality Management

10. As reinforced within the AQS, Part IV of the Environment Act 1995 introduces a statutory duty for local authorities to undergo a process of Local Air Quality Management (LAQM). This requires local authorities to Review and Assess air quality to determine the likeliness of compliance, regularly and systematically.

11. Where any of the prescribed AQS objectives are not likely to be achieved, the authority must designate an Air Quality Management Area (AQMA). For each AQMA, the local authority is required to prepare an Air Quality Action Plan, which details measures the authority intends to introduce to deliver improvements in local air quality in pursuit of the relevant objective.

3.1.3. Environmental Protection Act 1990

12. Part III of the EPA 1990 (as amended) contains the main legislation on statutory nuisance and allows local authorities and individuals to take action to prevent a statutory nuisance. Section 79 of the EPA defines, amongst other things, smoke, fumes, dust and smells emitted from industrial, trade or business premises so as to be prejudicial to health or a nuisance, as a potential statutory nuisance.

3.2. Guidelines, Standards and Best Practices

13. Several guides, standards and best practice documents are considered in the development of this plan. These documents are designed to offer guidance in reducing impacts of air pollution, based on expert evaluation of current scientific evidence. These documents are not legally binding, they are however often referred to as references for defining and measuring air quality.

- Defra: Local Air Quality Management Technical Guidance 2016 (LAQM.TG16) (2021);
- Environment Agency: Monitoring Particulate Matter in Ambient Air around Waste Facilities (2013);

- Environmental Protection United Kingdom (EPUK) and Institute of Air Quality Management (IAQM) Land-Use Planning & Development Control: Planning for Air Quality (2017);
- IAQM: Guidance on the Assessment of Dust from Demolition and Construction, v1.1 (2016); and
- IAQM: Guidance on Monitoring in the Vicinity of Demolition and Construction Sites, v1.1 (2018).

3.2.1. Guideline Limits to Prevent Dust Nuisance

14. Fractions of dust greater than 10µm (i.e. greater than PM₁₀) in diameter typically relate to nuisance effects as opposed to potential health effects and therefore are not covered within the UK AQS.
15. There are no statutory limit values for dust deposition above which ‘nuisance’ is deemed to exist as it is a subjective concept. However, a deposition rate of 200mg/m²/day is generally adopted for the onset of complaints, as proposed by the IAQM and the Environment Agency – relating to monitoring methods that are acknowledged as coming into use through ‘custom and practice’.

4. BASELINE CONDITIONS

4.1. Review of Local Air Quality Monitoring

16. The nearest AQMA relative to the site is located greater than 3.5km away, within Ipswich. As such, air quality within the immediacy of the EA THREE Paper Mill Lane Works Stage is not considered to be sensitive with respect to human health.
17. Monitoring data collected prior to the COVID-19 pandemic (i.e. pre-2020) has been used to characterise the baseline environment, as pollutant concentrations monitored during 2020 and 2021 are expected to be atypical, and not representative of the local environment and have therefore not been considered.
18. MSDC did not undertake any automatic monitoring of pollutants in their administrative area in 2019. The neighbouring Ipswich Borough Council (IBC) has two automatic monitors, but they are located greater than 3.5km from the site. In addition, MSDC and IBC undertook passive NO₂ diffusion tube monitoring within their administrative area in 2019. The nearest passive diffusion tubes in 2019 were located greater than 3.5km south east of the site along the A1214. Given the separation distance and anticipated differences in local environments, monitoring from automatic and non-automatic locations have not been considered further.

4.2. Defra Mapped Background Concentrations

19. Defra maintains a nationwide model of existing and future background air quality concentrations at a 1km grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The data sets include annual average concentration estimates for NO₂, PM₁₀ and PM_{2.5} using a base year of 2018 (the year in which comparisons between modelled and monitoring are made).
20. The 2022 Defra mapped annual mean background concentrations for the grid squares covering the Paper Mill Lane Works (representing the earliest anticipated year of construction) are presented in Table 4-1. All the mapped background concentrations presented are well below the respective annual mean AQALs.

Table 4-1 Defra Background Pollutant Concentrations

Grid Square (X, Y)	Year	Annual Mean Background Concentration (µg/m ³)		
		NO ₂	PM ₁₀	PM _{2.5}
612500, 248500	2022	10.2	15.3	9.1
612500, 249500	2022	11.0	16.4	10.0
613500, 248500	2022	12.5	17.9	10.4
613500, 249500	2022	10.7	17.3	10.1
AQAL		40	40	25

5. CONSTRUCTION DETAILS

5.1. Cable Works – Overview

21. The construction works will be spread across a 37km corridor between the Suffolk coast at Bawdsey and the Converter Station at Bramford, passing the northern side of Ipswich. The cables will be pulled through pre-installed ducts laid during the onshore works for East Anglia ONE. The construction activity within each section along the onshore cable route will be as follows:
- Any minor temporary modifications to the public road network;
 - Establish the Construction Consolidation Sites (CCSs);
 - Establish accesses to, and temporary haul road to, the jointing bay locations;
 - Establish temporary jointing bay compounds;
 - Excavate jointing bay pit to locate the existing ducts at each of the compounds;
 - Construct jointing bay;
 - Transport of cables to site, pull cables through ducts and undertake jointing;
 - Topsoil replacement and seeding;
 - Remove temporary compounds (jointing bays and CCS); and
 - Reinstatement all disturbed land and permanent fences and hedges.
22. Some temporary modification of the existing road networks may be required such as localised widening, temporary widening or socketing of street signs and temporary moving of street furniture in order to allow larger vehicles than normal to access the jointing bays. This will be completed prior to the start of the main construction works within relevant sections of the cable corridor route.
23. EATL will require up to seven temporary construction compounds to aid in the construction of the proposed East Anglia THREE project. These have been designated as 'Primary Construction Consolidation Site' (PCCS) and 'Secondary Construction Consolidation Site' (SCCS) depending on their uses. Two PCCS and up to five SCCS will be installed, which will all be temporary and will be removed once construction is complete.

Table 5-1 – Construction Consolidation Site Locations

CCS Type	ID	Address
Secondary	A	Bullen Lane, Bramford, Ipswich, Suffolk IP8
Primary	B	Paper Mill Lane, Claydon, Ipswich, Suffolk IP6 OAP
Secondary	C	Witnesham Road, Ipswich, Suffolk IP6
Secondary	D	Playford Corner, Playford Mount, Ipswich, Suffolk IP6 9DS
Primary	E	Top Street, Martlesham, Suffolk IP12
Secondary	F	Clappits, Woodbridge Road, Newbourne, Woodbridge, Suffolk IP12 4PA
Secondary	G	Park Lane, Ipswich, Suffolk IP10

24. The PCCSs will:
- Form the main point of access onto the linear construction site;
 - Provide areas for the storage of materials and equipment;
 - House site administration and welfare facilities for the labour resources;
 - Form an interchange hub for deliveries of material, equipment and resources; and
 - Allow HGVs to park prior to entering the local road network during peak hours.
25. The SCCSs will act as hubs for the delivery of materials, equipment and resources along the route and will enable access to the cable route for construction. They will be of sufficient size to accommodate limited storage of materials, equipment and labour welfare facilities.
26. It is anticipated that 29 jointing bays will be required along the 37km cable route, in addition to a transition bay at the landfall. Each jointing bay will comprise a concrete box 10m long by 3m wide by 1.5m high buried so that the base is 2.5m below ground level. A jointing bay construction compound will be required adjacent to each jointing bay and will have hardstanding areas of up to 900m² within the compound which would typically measure 24m x 115m i.e. 2,760m². (in accordance with Requirement 12(11) which stipulates that the footprint must not exceed 3,740m²). The compounds will have hardstanding and accommodate containers, drum

trailer movement, parking, and welfare. A typical layout is shown in Figure 2 of the Code of Construction Practice (EA3-LDC-CNS-REP-IBR-000065).

27. Existing accesses and farm tracks will be upgraded and used where possible to access the jointing bay locations. Once these accesses reach the cable corridor, the routes to connect to the jointing bays are referred to as 'haul road'. The length of haul road for the cable route is limited by Requirement 12(12) of the DCO to 18.05km.
28. In addition, the ducts to be used for EA THREE, which were installed during the EA ONE project construction works, will require to be 'proved' to ensure that they are intact and free of debris. This will be undertaken by the use of foam pigs which will be driven under pressure from jointing bay to jointing bay. Each stretch of duct that was installed using Horizontal Direct Drilling (HDD) will, however, require duct-proving excavations at each end of the HDD, to allow the use of different size foam pigs, due to a difference in the diameter of these compared to the ducting installed using open trench techniques.

5.2. Paper Mill Lane Works

29. Paper Mill Lane Works comprise a stage of the onshore connection works and cover Work No.s 50 and 51. The infrastructure within these work no.s comprises:

- The Paper Mill Lane PCCS in Work No. 51;
- Jointing Bay 4 in Work No. 50;
- Two new accesses with the public road (Paper Mill Lane) as follows:
 - Access AP-AF to the east of Paper Mill Lane, to access the PCCS and Jointing Bay 4; and
 - Access AP-AG to the west of Paper Mill Lane to access the ends of the HDD ducts;
- The access track/haul road required to access the PCCS and Jointing Bay 4;
- Two stretches of trackway to reach duct proving excavations at the ends of the HDD ducts in the Work No.s to the east and west of the Paper Mill Lane Works; and
- Turning circle and HGV parking area in Work No 51 to allow HGV movements to be safely coordinated.

30. These works are shown on Figure 1.

31. Paper Mill Lane PCCS and the two accesses from Paper Mill Lane were used as part of the EA ONE construction works and have now been reinstated, other than part of the access to the east which has been partially reinstated, and so will need to be constructed again under the EA THREE DCO. There are no public rights of way within the site.

5.2.1. Accesses AP-AF and AP-AG, Access Track, Haul Road and Trackway (Work No. 50)

32. Paper Mill Lane PCCS and the Jointing Bay will be accessed from Paper Mill Lane using Access AP-AF. This access was used for the EA ONE project and has now been partially reinstated. Planning permission has been granted for the access that remains (Reference DC/20/05669). From Access AP-AF, a new temporary vehicular access track of 180m length and 5.5m width will be used to access the Paper Mill Lane PCCS and also reach the edge of the cable corridor (Work No. 50), where 90m of 5.5m wide haul road will link to the jointing bay. From here, 140m of 5.5m wide trackway will be installed to reach the excavation point on the HDD ducts in Work No. 49. Of this trackway, 90m will be within Work No. 49 and is not part of the Paper Mill Lane Works.

33. An access (Access AP-AG) will also be required on the west side of Paper Mill Lane, along with a 185m length of trackway to reach the proposed HDD duct proving excavation in Work No. 52 during the main cable works. Only 33m of this trackway will be within the Paper Mill Lane Works.

34. No watercourse crossings will be required for the Paper Mill Lane Works.

35. The construction methodologies associated with the access, access track and haul roads are typically as follows:

- Set out the access and track/haul road with the use of Global Positioning Systems (GPS) Real Time Kinematic (RTK) equipment;
- Locate, divert and cap any existing field drains;
- Set out and install drainage features the length of track to be constructed;
- Remove vegetation, then remove and locally store topsoil material over the working width; seeding topsoil if it is to be stored for longer than 6 months;
- Excavate to formation level and store any excess material;

- Under-track drainage will be installed where necessary and in accordance with drainage requirements;
- Place a geotextile onto existing subsoil to improve the bearing capacity of the sub-soil, depending on ground conditions, programme and landowner requirements;
- Place imported stone in accordance with the design to form the track structure; and
- For the trackway, following the setting out of the route using GPS RTK, the trackmatting would be installed directly on the existing ground surface.

5.2.2. Primary Construction Consolidation Site (Work No. 51)

36. The Paper Mill Lane PCCS (CCS B) will be a designated storage and delivery facility and also the main administrative compound for the onshore cable works. The dimensions of the PCCS at Paper Mill Lane will be 90m long by 40m wide covering a surface area of 3,600m², this is in accordance with Requirement 12(9)(a) which limits the size of each PCCS to 3,600m². The Paper Mill Lane PCCS will also be within the area previously used for the EA ONE PCCS in this location.
37. The construction of the PCCSs involves stripping of topsoil, importing and laying stone for the compound base and installing cabins and welfare facilities. Construction of the Paper Mill Lane PCCS will take approximately 3 weeks and the methodology will be as follows:
- The extent of PCCS will be marked out with the use of GPS RTK equipment;
 - Any existing field drains will be located, diverted and capped;
 - Drainage features will be set out and installed as required;
 - Security fencing will be erected around the perimeter of the PCCS;
 - Once vegetation has been removed, topsoil material over the PCCS area will be removed and locally stored and seeded if it is to be stored for longer than 6 months;
 - Any excess material will be excavated to formation level and stored; and
 - Imported stone will be placed in accordance with the design of the PCCS base structure.
38. An HGV queuing area (195m²), turning circle (303m²) and parking up area (447m²) will also be required adjacent to the PCCS. This will enable a key part of the EA THREE traffic strategy which requires any HGVs arriving via the strategic road network during peak hours to park up at the Primary CCS, as HGVs will only be permitted to enter the local road network during permitted delivery windows (generally 9am-4.30pm (see Table 6-2 of the Traffic Management Plan (EA3 LDC-CNS-REP-IBR-000039))).
39. The Paper Mill Lane PCCS will be constructed first in summer 2022, with the duct proving, jointing bay and cable pull through occurring at a later date (anticipated in 2024). It is intended that the PCCS will provide an early onsite presence for the onshore cable construction works and will be used as a base for mitigation and survey works being undertaken as well as for the construction team to visit site during the later stages of the planning and design process. It will also be used for stakeholder and other site meetings.
40. The Paper Mill Lane PCCS will remain in situ for the duration of the onshore cable works, prior to being restored as described in Section 5.2.4.

5.2.3. Jointing Bay 4 (Work No. 51)

41. The jointing bay will be located within Work No. 50, 150m to the south east of the PCCS at OS Grid Reference 613067, 248933.
42. Once the location of the jointing bay compound has been established (using GPS RTK equipment), creation of the compound will commence with erection of temporary security fencing, removal of topsoil layer and installation of hardstanding areas.
43. The jointing bay will then be excavated to a depth of up to 2.5m with adequate slope batter or shoring on all sides of the excavation to prevent the soil from collapse. The existing ducts will be uncovered and concrete slabs constructed to provide a level working area. Two sump pits will be included to facilitate drainage and dewatering and water will be treated, where necessary, before being discharged. Installation and jointing of the cables will then take place, along with installation of earthing link boxes and fibre optic cable chambers, before the area is back filled with subsoil.
44. The creation of the jointing bay compound and excavation of the jointing bay will each take a week.

5.2.3.1. Cable Installation

45. The electrical transmission cables will be delivered to the CCS, from where they will be transferred to the jointing bay compound when needed. The cable drums will comprise abnormal loads and their delivery will be managed as set out in the Traffic Management Plan (EA3-LDC-ONCS-REP-IBR-000032). Two cable lengths of approximately 1,260m will be required to pull through between each pair of jointing bays. The cable ducts will be proved before the cable is pulled through. Once the cables are received at the jointing bay compound, they will be temporarily stored on the hardstanding area prior to installation in the pre-installed ducts.
46. Installation of the cables into the ducts between Jointing Bay 4 and Jointing Bay 3 (not part of the Paper Mill Lane Works) will begin with a cable pulling system being installed into the bay. A steel bond and winching system with free spinning rollers will be installed along the bottom of the bay. Hydraulic jacks will raise the cable drum off the ground and a winch will be used to pull in cable using a pulling rope. A dynamometer will ensure the maximum pulling tension is not exceeded. Tension on the cable will be reduced using a biodegradable water-based lubricant. This process will be repeated for the second cable being installed in the duct. The cables will then be jointed once 2 cable sections (4 cables) have been installed.
47. It is expected that pulling and jointing operations would take approximately 2.5 weeks, typically spread over a three to four week period, with approximately five workers for each jointing bay. These works will then be repeated to install the cables between Jointing Bays 4 and 5.

5.2.4. Reinstatement

48. Following installation and jointing of the cables, the jointing bay, jointing bay compound, access and haul road will be reinstated with the stored topsoil and subsoil following trenching. If necessary, the subsoil will be 'ripped' prior to placement if compaction had occurred. Topsoil will be spread in such a way as to ensure that it does not become compacted. The topsoil will then be cultivated and reseeded (if required) and suitable hedgerow species replanted during the first appropriate planting season, in accordance with the Landscape Management Plan (EA3-LDC-ONCS-REP-IBR-000064). Temporary fencing around any new planting would be removed once reinstatement was established.
49. Trackway will be removed following installation of the cables in the adjacent Work No.s.
50. The PCCS will remain in situ for the duration of the cable works and will then be removed and reinstated as outlined above..

5.3. Schedule and Working Hours

51. The construction of the Paper Mill Lane Works is proposed to start in July 2022, with the installation of the CCS and access to it, over a 5 week period. The main construction works at Paper Mill Lane will then take place from 2024 over approximately 18 months to 2 years, however the works at this location would be of 6 weeks duration in total, over a 5 month period.
52. The PCCS will be constructed first within the staging of the construction works, with the duct proving, jointing bay and cable pull through occurring at a later stage. The Paper Mill Lane PCCS will remain in situ for the duration of the onshore cable works, prior to being removed and reinstated as outlined in Section 5.2.
53. It is expected that the creation of the jointing bay compound and excavation of the jointing bay would take approximately ten days spread over a four to six working week period, with approximately five workers for each jointing bay. These works will then be repeated to install the cables between Jointing Bays 4 and 5.
54. DCO Requirement 25 defines the construction working hours as follows:

25.—(1) Construction work for the connection works must only take place between 0700 hours and 1900 hours Monday to Saturday, with no activity on Sundays or bank holidays, except as specified in paragraph (2).

(2) Outside the hours specified in paragraph (1), construction work may be undertaken for essential and non-intrusive activities including but not limited to:

(a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring;

(b) fitting out works associated with the onshore substation(s) comprised within Work No. 67;

(c) delivery to the connection works of abnormal loads that may cause congestion on the local road network;

(d) connection works carried out on the foreshore;

(e) daily start up or shut down;

(f) electrical installation; and

(g) non-destructive testing.

(3) All construction work undertaken in accordance with paragraph (2)(a) to (d) must be agreed with the relevant planning authority in writing in advance, and must be carried out within the agreed time.

5.4. Construction Road Traffic

55. Construction phase road traffic will access the Paper Mill Lane Works via Paper Mill Lane. Further detail is provided in the Paper Mill Lane Works Traffic Management Plan (Doc. ID: EA3-GRD-CON-PLN-IBR-000032).

56. An assessment of the potential impacts associated with construction road traffic was undertaken as part of the previously submitted 2015 Environmental Statement (ES). This considered road traffic volumes generated by all onshore construction activities. In accordance with the EPUK and IAQM guidance, effects upon NO₂, PM₁₀ and PM_{2.5} concentrations at existing receptors were considered to be ‘not significant’. No further consideration was therefore needed. HGVs generated by construction activities associated with the Paper Mill Lane Works will be lower than those assessed as part of the ES. Furthermore, the flows attributed to the Paper Mill Lane Works within the ES are considered to be conservative upon reflection, as confirmed by the project team. The findings of the ES, therefore, remain relevant and no further consideration is needed.

5.5. Non-Road Mobile Machinery

57. To facilitate construction, non-road mobile machinery (NRMM) will be used. NRMM refers to mobile machines, transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads. An inventory of NRMM proposed to be used for the construction of the Paper Mill Lane Works is presented in Table 5-1.

58. Following application of suitable controls (such as those outlined in Section 79), emissions from NRMM used during the construction phase are unlikely to make a significant impact on local air quality – as per LAQM.TG(16).

Table 5-1 Details of NRMM

Construction Activity	NRMM Construction Equipment
Jointing Bays and HDD excavations	Generator
	Telehandler
	30T Excavator
	Loader
	Tractor and trailer
	Cable winch
	HIAB crane lorry
	Lorry and low loader
CCS/Accesses/Haul Roads	Loader
	D8 Dozer
	Grader
	Road Roller
	20T Dumper
	30T Excavator
	Tractor and trailer
	Bowser
Sweeper	

6. CONSTRUCTION DUST ASSESSMENT METHODOLOGY

59. A construction dust assessment was undertaken as part of the wider ES, using guidance documents and associated methodologies that are still considered relevant and up to date. A separate dust assessment has been undertaken (in accordance with IAQM guidance) which focuses solely on construction activities proposed at the Paper Mill Lane Works, with the use of updated information

from the contractors. In addition, a number of mitigation measures (including those set out in the Outline Code of Construction Practice) have been included within this AQMP to provide a best practice approach.

60. The assessment of risk is determined by considering the risk of dust effects arising from four activities in the absence of mitigation. The assessment will consider the potential dust impacts associated with the following activities:

- Demolition
- Earthworks;
- Construction; and
- Track-out.

61. The assessment methodology considers three separate dust impacts with account being taken of the sensitivity of the area that may experience these effects:

- Annoyance due to dust soiling;
- The risk of health effects due to an increase in exposure to PM₁₀; and
- Harm to ecological receptors.

62. The first stage of the assessment involves a screening exercise to determine if there are sensitive receptors within threshold distances of the site activities associated with the construction phase of the scheme. Further assessment is required where a:

- Human receptor is located within 350m of the Site, and/or within 50m of routes used by construction vehicles, up to 500m from the site entrance(s); and/or
- Ecological receptor is located within 50m of the Site, and/or within 50m of routes used by construction vehicles, up to 500m from the site entrance(s).

63. The dust emission class (or magnitude) for each activity is determined based on the guidance, indicative thresholds and expert judgement. The risk of dust effects arising is based upon the relationship between the dust emission magnitude and the sensitivity of the area. The risk of impact is then used to determine the appropriate mitigation requirements, whereby through effective application, residual effects are considered to be 'not significant'.

64. The IAQM guidance therefore does not provide a framework to determine the significance of unmitigated effects, as is not considered appropriate nor relevant in this context. For these reasons, the significance of unmitigated effect of construction dust cannot be defined.

7. CONSTRUCTION PHASE DUST ASSESSMENT

7.1. Assessment Screening

65. There are human receptors within 350m of the construction works but no ecologically designated sites within 50m of the site boundary or within 50m of roads that will witness construction traffic movements up to 500m from the site entrance(s). Therefore, an assessment of construction dust on human receptors only is required.

7.2. Potential Dust Emissions Magnitude

66. A summary of the dust emission magnitude for the four assessed activities is provided in the following text and summarised in Table 7-1. This assessment has used information provided by the appointed construction contractors.

7.2.1. Demolition

67. There are no existing buildings or structures currently occupying the site which are to be demolished. As such, an assessment of the potential dust impacts associated with this activity has been screened out from requiring assessment.

7.2.2. Earthworks

68. Site earthworks are required over an area between 2,500 - 10,000m². However, it is expected that there will be a maximum of less than 5 heavy earth moving vehicles active at any one time moving up to a maximum 20,000 tonnes of material. Bunds of material

are to be formed for topsoil and subsoil up to 2m and 3m in height, respectively. As such, the overall dust emissions magnitude for earthworks is therefore conservatively considered to be 'medium'.

7.2.3. Construction

69. The proposals comprise the construction and use of the PCCS, a jointing bay compound and associated infrastructure, as discussed in Section 5. The aggregated building volume is <math><25,000\text{m}^3</math> of portacabins comprising off-site manufactured, prefabricated units and therefore minimal potential for dust release. As such, the potential dust emission magnitude for construction is therefore initially considered to be 'small'.

7.2.4. Trackout

70. Construction vehicles will access the site via Paper Mill Lane, connecting to a stone road to the east to link to the PCCS and jointing bay. There will also be an access to the west off Paper Mill Lane leading to a track matting road to the HDD excavation location. The maximum number of outward HGV movements in any one day is expected to be 10-50. Any unpaved roads are anticipated to have the potential to be >100m. As such, the potential dust emission magnitude for trackout is therefore initially considered to be 'medium'.

Table 7-1 Potential dust emission magnitude

Activity	Dust Emission Magnitude
Earthworks	Medium
Construction	Small
Trackout	Medium

7.3. Sensitivity of the Area

71. A summary of the sensitivity of the surrounding area is detailed in the following text and summarised in Table 7-2.

7.3.1. Dust Soiling

72. There are one to ten existing residential properties (highly sensitive receptors) within 350m of the Site boundary. There are no receptors within 50m of the public highway up to 200m from the Site exit along Paper Mill Lane (commensurate of a medium trackout magnitude).

73. The sensitivity of the area with respect to dust soiling effects on people and property in relation to earthworks and construction is therefore considered to be 'low'.

7.3.2. Human Health

74. The maximum 2022 Defra mapped background PM₁₀ concentration (2018 base year) for the 1km² grid square centred on the site is estimated to be 17.9µg/m³ (i.e. falls into the <math><24\mu\text{g}/\text{m}^3</math> class). As discussed in Section 4.1, no local background PM₁₀ monitoring exists within the development locale.

75. Given the above information regarding the number of residential receptors within 50m of the Site, the sensitivity of the area with respect to human health impacts in relation to earthworks and construction is therefore considered to be 'low'.

Table 7-2 Sensitivity of the Area

Potential Impact	Earthworks	Construction	Trackout
Dust Soiling	Low	Low	-
Human Health	Low	Low	-

7.4. Risk of Impacts (Unmitigated)

76. The calculated sensitivities and dust emission magnitudes for each activity and impact are combined to determine the risk of impact (unmitigated) which is used to inform the selection of appropriate mitigation for inclusion within the AQMP, and implementation throughout the construction phase.

Table 7-3 Risk of dust impacts (unmitigated)

Potential Impact	Earthworks	Construction	Trackout
Dust Soiling	Low Risk	Negligible	N/A
Human Health	Low Risk	Negligible	N/A

77. Following the construction dust assessment, the Site is found to be at worst ‘Low Risk’ in relation to dust soiling effects on people and property and human health impacts. In addition, potential dust effects during the construction phase are considered to be temporary in nature and may only arise at particular times (i.e. certain activities and/or meteorological conditions).
78. Nonetheless, commensurate with the above designation of dust risk, mitigation measures, as identified in the IAQM guidance, are required to ensure that any potential impacts arising from the construction phase of the proposed development are reduced and, where possible, completely removed.

8. CONTROL MEASURES AND MITIGATION

79. The air quality control measures set out below will be included in the relevant Risk Assessment and Method Statement that will be submitted for each construction activity by all appointed contractors. The mitigation measures proportionate to the scale and extent of impacts predicted, have been recommended to be implemented. The mitigation measures considered in the AQMP are included in the various standards and best practice guidelines.
80. The air quality control measures presented in Table 8-1 comprise the Highly Recommended and Desirable measures identified as a result of the Construction Phase Dust Assessment set out in Section 7 and also a number of further best practice measures which were included, *inter alia*, within the AQMP for EA ONE.
81. During the construction phase, a proactive approach will be taken to ensuring the potential for fugitive dust emissions is minimised, rather than pursuing a reactionary approach i.e. when a complaint is made. This will be achieved through the implementation of a monitoring strategy as detailed in Section 9. This strategy will comprise routine visual inspections by onsite contractors and application of the ‘as needed’ or ‘as necessary’ controls identified in Table 8-1, i.e. if the levels of dust deposition are seen to increase significantly during the visual inspections, further dust controls will be implemented as appropriate from the list of measures presented. This process is illustrated in Appendix A.

Table 8-1 Air Quality Control Measures

Mitigation Measure - Category	Description	Timing	Responsibility
Sustainable Travel and Machinery	Ensure all vehicles switch off engines when stationary - no idling vehicles.	Ongoing	All personnel
	Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable.	Ongoing	Principal Contractor
	Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas	Ongoing	Site Manager/Principal Contractor
Operations	Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.	As needed	Principal Contractor
	Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	As needed	Principal Contractor
	Use enclosed chutes and conveyors and covered skips (other than where materials are not dust-generating and the covering of the skips introduces risks for loading and unloading).	Ongoing	Principal Contractor
	Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	Ongoing	All personnel
	Monitor weather forecasts for prolonged dry or windy conditions and modify (or delay) potentially dusty site activities until the risk has reduced.	Ongoing	Principal Contractor/Site Manager
	Ensure equipment is 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.	Ongoing	Principal Contractor
	Preparing and Maintaining the Site	Plan the site layout so that machinery and dust causing activities are located as far from receptors identified in Table 9 1 and Figure 2, unless required for works.	As needed
Erect effective solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.		As needed	Principal Contractor
Enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.		As needed	Principal Contractor/all personnel
Keep site fencing, barriers and scaffolding clean using wet methods eg fine water spray.		Ongoing	Principal Contractor
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.		As needed	Principal Contractor/all personnel
Cover, seed or fence stockpiles to prevent wind whipping.		Ongoing	Site Manager/Principal Contractor
If any high-risk construction sites are identified within 500m of the site boundary, liaison will be undertaken to ensure plans are co-ordinated and dust and particulate matter emissions are minimised, including with respect to interactions of the off-site transport/deliveries which might be using the same strategic road network routes.		One off	Principal Contractor
Implementation of energy conservation measures including instructions to throttle down or switch off idle construction equipment; switch off the engines of trucks while they are waiting to access the site and while they are being loaded or unloaded, ensure equipment is properly maintained to ensure efficient energy consumption		Ongoing	Principal Contractor
Construction Traffic		Runoff of mud and water will be prevented.	As needed
	Use water-assisted dust sweeper(s) on the access road and Paper Mill Lane, to remove, as necessary, any material tracked	As needed	Principal Contractor

Mitigation Measure - Category	Description	Timing	Responsibility
	out of the site. This may require the sweeper being continuously in use.		
	Vehicles leaving site will be washed if necessary.	Ongoing	Principal Contractor
	Implement a wheel washing system to dislodge accumulated dust and mud prior to leaving the site.	As needed	Principal Contractor
	Regularly dampen down haul routes with fixed or mobile sprinkler systems, where necessary.	As needed	Principal Contractor
	Avoid dry sweeping of large areas.	As needed	Principal Contractor
	Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. Locate site access gates at least 10m from receptors where practicable.	As needed	Principal Contractor
	Ensure all vehicles entering and the leaving the site which are carrying loads are covered to prevent escape of materials during transport	Ongoing	Site Manager/Principal Contractor
	Record all inspections of haul routes and any subsequent action in a site logbook.	Ongoing	Principal Contractor/all personnel
	Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable	Ongoing	Principal Contractor/Site Manager
	Monitoring of haul road surface condition.	Ongoing	Principal Contractor
Site Management	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	Ongoing	Principal Contractor/Site Manager
	Make the complaints log available to the local authority when asked.	As needed	Community Liaison Officer
	Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the logbook.	As needed	Principal Contractor/Site Manager
	Temporary cover, screen or revegetate earthworks/stockpiles, if possible, as soon as is practicable. A low maintenance grass mix will be sown as soon as possible after creation of any soil storage mounds which are intended to remain in situ for more than 6 months or over the winter period. The optimum months for sowing grass seed are April or September to October.	As needed	Principal Contractor
	Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	As needed	Site Manager/Principal Contractor
	Wetting/dampening of dust generating stockpiles	As needed	Principal Contractor
	Stockpiles would be kept in place for the shortest possible time.	Ongoing	Principal Contractor
	Dust-generating activities will be minimised.	Ongoing	All personnel
	Where diesel- or petrol-powered generators are used, best practice measures will be implemented including regular inspections with respect to black smoke and siting away from pedestrian areas.	Ongoing	Principal Contractor
	Fine powder materials (e.g bulk cement/grouts) to be delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	Ongoing	Principal Contractor
	For smaller supplies of fine powder materials, ensure bags are sealed after use and stored appropriately to prevent dust release.	Ongoing	Principal Contractor
	Inspections and monitoring to be undertaken as set out in Section 9 of this AQMP.	Ongoing	Principal Contractor
Waste Management	Bonfires and burning of waste will not be allowed on Site.	Ongoing	Principal Contractor/all personnel

Mitigation Measure - Category	Description	Timing	Responsibility
NRMM	All NRMM should be well maintained. If any emissions of dark smoke occur, then the relevant machinery should stop immediately, and any problem rectified.	Ongoing	Principal Contractor
	All NRMM will use ultralow sulphur diesel (fuel meeting the specification within EN590:2004), where available.	Ongoing	Principal Contractor
	All NRMM to comply with either the current or previous EU Directive Staged Emission Standards.	Ongoing	Principal Contractor
	All NRMM will be fitted with Diesel Particulate Filters (DPF) conforming to defined and demonstrated filtration efficiency (load/duty cycle permitting).	Ongoing	Principal Contractor
	The on-going conformity of plant retrofitted with DPF, to a defined performance standard will be ensured through a programme of onsite checks.	Ongoing	Principal Contractor
	Implementation of fuel conservation measures including instructions to throttle down or switch off idle construction equipment; switch off the engines of trucks while they are waiting to access the site and while they are being loaded or unloaded, ensure equipment is properly maintained to ensure efficient fuel consumption	Ongoing	Principal Contractor
	Regular servicing and checks of all plant/equipment e.g. black smoke from exhausts	Ongoing	Principal Contractor

82. In addition to the above mitigation, a Traffic Management Plan (EA3- LDC-CNS-REP-IBR-000032) and a Travel Plan (EA3- LDC-CNS-REP-IBR-000033) have been developed to manage the sustainable delivery of goods and materials and to support and encourage sustainable travel for contractor operatives and staff (public transport, cycling and car-sharing (subject to Covid-19 restrictions)) and thereby minimise the associated air quality impacts.

9. MONITORING

83. The principal purpose of monitoring will be to ensure that the mitigation measures on site are effective in the management of dust propagation.

84. If the ‘ongoing’ controls detailed in Section 79 are implemented appropriately during the onshore construction works, then likely dust generation and other emissions from the construction site will be minimised and rendered ‘not significant’. However, site inspections and visual monitoring will be undertaken as an effective way to verify that air pollution control measures have been properly designed and implemented. This will also inform whether supplementary controls (i.e. those marked as ‘as necessary’ or ‘as needed’) are required. This process is illustrated in Appendix A.

85. Details of the monitoring programme are provided below.

9.1. Visual Inspections

86. Visual inspections for dust generated from haul trucks, vehicle traffic, earthworks and other relevant activities will be undertaken every morning and afternoon and observations recorded after each inspection. These inspections will be undertaken in the vicinity of the working site boundary (external and internal), and, where these checks indicate the potential for off-site dust impacts, then at sensitive receptor locations within proximity of the site (subject to landowner approval) – as outlined in Table 9-1 and illustrated in Figure 2 Air Quality Sensitive Areas. These locations represent areas of sensitivity where monitoring should be focussed at or in proximity to, upwind side relative to the dust sources.

Table 9-1 Sensitive Area for Visual Inspections

Sensitive Area	Address	Type
SA1	Residential Properties, off Old Ipswich Road	Residential Properties
SA2	Binder Ltd, off Old Ipswich Road	Waste Management Service
SA3	Hill View Business Park, off Old Ipswich Road	Business Park
SA4	Mockbeggars Hall, off Paper Mill Lane	Residential Properties
SA5	Warehouse, off Paper Mill Lane	Warehouse
SA6	Farmhouse, off Paper Mill Lane	Residential Property
SA7	Premier Inn Ipswich North, off Paper Mill Lane	Hotel
SA8	Residential Properties, off Paper Mill Lane	Residential Properties
SA9	Farmhouse, off Paper Mill Lane	Residential Property

87. The visual inspections will check for the presence of deposited dust on surrounding surfaces (cars and vegetation) within 100m of the Site and subject to landowner approval, , if site inspections indicate off-site deposition is a possibility. If dust is noticed, or there is deemed to be a ‘dust episode’ then this will be recorded and the information made available to MSDC on request. The source(s) of emissions will be investigated to determine if any site activity is responsible, with remedial action taken and documented. The dust record should include:

- Time and date;
- Confirmation of any visible dust sources;
- Remedial actions taken if on-site emissions observed; and
- Wind direction and strength.

88. The frequency of visual inspections will be increased when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions particularly when in close proximity to receptors. The weather forecasts will be checked in advance to determine the potential for high-risk dust events (e.g. dry weather and strong winds towards sensitive receptors). Forecasts will be used to trigger for preventive dust management action to be taken. In some cases there may be an opportunity to modify (or delay) potentially dusty site activities until the risk has reduced.

9.2. Site and Equipment Audits

89. Application of the controls detailed in Table 8-1 will be monitored regularly by the Principal Contractor, Site Manager and Environmental Clerk of Works (EnvCoW) throughout the construction phase, as set out in the Project Environmental Management Plan (Appendix 10 of the CoCP) and Contractors’ Construction Environmental Management Plans. If non-conformity with any of the control and mitigation measures is identified, it will be recorded and appropriate remedial actions will be implemented.

90. Any incidents that cause dust and/or air quality emissions and remedial actions shall be recorded.

91. Site inspections should verify if vehicle traffic and/or NRMM emissions are consistently black. This is a signal that an engine is not operating optimally which should be turned off until rectified.

10. RESPONSIBILITIES

10.1. Implementation

92. The responsibility for ensuring this AQMP is adhered to lies with the Principal Contractor, Site Manager and EnvCoW. They will be assisted by the Contractor’s Site Manager. There shall be a competent person on site during working hours responsible for the dust management measures. Responsibilities will be allocated to specific personnel to ensure dust generation is effectively controlled.

10.2. Roles and Responsibilities

93. The persons nominated to be responsible for tasks as defined in this AQMP are outlined below:

- EnvCoW:
 - Responsible for the implementation of this plan and preparing reports to the client and the stakeholders as required;

- Responding to complaints in consultation with the Site Manager and informing the relevant stakeholders where necessary of the complaint, the source of the complaint and any action which was taken;
- Ensures any complaints are responded to promptly by the Contractor's Site Manager; and
- The EnvCoW will normally be a person located centrally within the developer's management structure. Alternatively, a member of the site team could be designated EnvCoW for the site, they should however be a different person to the Contractor's Site Manager.
- Site Manager:
 - Ensure mitigation measures are in place and that the AQMP is being followed. This should be undertaken in consultation with the EnvCoW; and
 - Responding to complaints, assisting with the investigation as to the causes of complaints, and ensuring appropriate mitigation measures are being used or employ further measures if required in consultation with the EnvCoW and MSDC.

10.3. Training

94. All employees, contractors and staff working on site will undergo site induction training, which will include environmental awareness training, including an understanding of air quality management issues. Individually focussed toolbox talks will also be required to be delivered by those contractors involved in the activities most likely to impact on the air quality.

95. The training will provide specific instructions about:

- Requirement for dust suppression at all times;
- How to avoid and suppress dust across worksite;
- Available dust suppression options;
- Work methods to prevent dust generation, such as maintaining site speed limits;
- Covering trucks loads;
- Cleanliness of vehicles, prior to exiting site;
- Road cleanliness, with regard to vehicles leaving the site onto public roads;
- Sensitive areas / receptors;
- Potential for condition changes and response strategies in windy conditions; and
- The importance of equipment maintenance.

96. Plant and equipment operators will be trained and experienced in the plant that they operate. Certification will be held on-site and available for inspection.

97. The importance of working to the requirements of the AQMP will be communicated at staff inductions and during daily activity briefings when activities that may create dust are to be undertaken.

11. COMMUNICATION

98. The following measures are mandatory and relate specifically to communication and are the responsibility of the Contractor Site Manager and Principal Contractor.

- Display and name the contact details of Community Liaison Officer (CLO) on the construction site boundary. The location of these signs will be on fencing adjacent to the dust sensitive receptors; and
- Display the head or regional office contact information.

11.1. Community Liaison

99. EATL is committed to providing clear communication to local residents and will manage public relations with local residents and businesses that may be affected by construction dust. Proactive community liaison 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. As outlined in the Project Community and Public Relations Procedure (Appendix 8 of the CoCP), a combination of communication mechanisms such as posters, notices, exhibitions, letters, newsletters, website updates and parish council meetings will be employed to keep local residents and businesses informed.

11.2. Complaints Procedure

100. In order that dust complaints can be substantiated, it is imperative that EATL is immediately informed either by the complainant themselves or MSDC. An EA THREE Complaints Procedure will be published on the project website. This will set out how complaints will be managed and will state that all enquiries will be logged, investigated and rectifying action taken when deemed appropriate. The CLO's telephone number shall be clearly displayed at the site entrance and local residents should be encouraged to contact the CLO and/or MSDC in the event of dust soiling. In the event of an emergency outside of normal office hours, the CLO's telephone number will be directed through to an on-duty member of the construction team for resolution.
101. The Principal Contractor's Site Manager and the EnvCoW will record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. All complaints regarding air quality and dust will be shared with MSDC, including a note of the actions taken and the measures to put in place to rectify any problem.

12. UPDATING THE AQMP

102. This AQMP is a 'live' document and as such it will be reviewed periodically; following any on-site incidents, changes in site operations or if elevated dust levels occur over a prolonged period requiring the AQMP to be updated. This will ensure that the AQMP will be updated with the release of new information.
103. Any updates will be agreed between EATL, Principal Contractor, Subcontractor/s and MSDC.

13. REFERENCES

Defra: Local Air Quality Management Technical Guidance 2016 (LAQM.TG(16)) (2021).

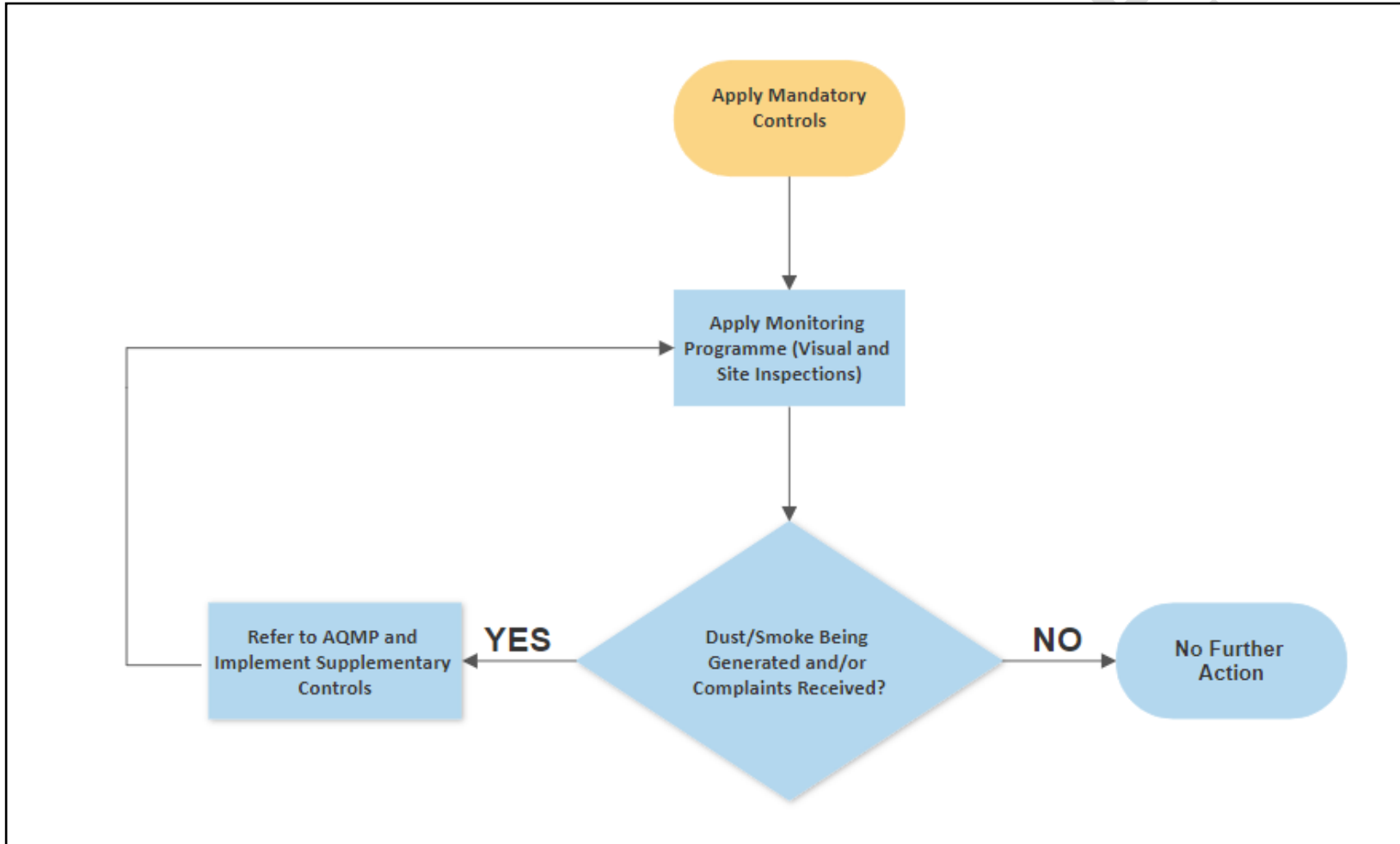
Environment Agency: Monitoring Particulate Matter in Ambient Air around Waste Facilities, (2013).

EPUK and IAQM Land Use Planning & Development Control: Planning for Air Quality, (2017).

IAQM. Guidance on the Assessment of Dust from Demolition and Construction, v1.1 (2016).

IAQM: Guidance on Monitoring in the Vicinity of Demolition and Construction Sites, v1.1 (2018).

APPENDIX A MONITORING CONTROL PROCEDURE

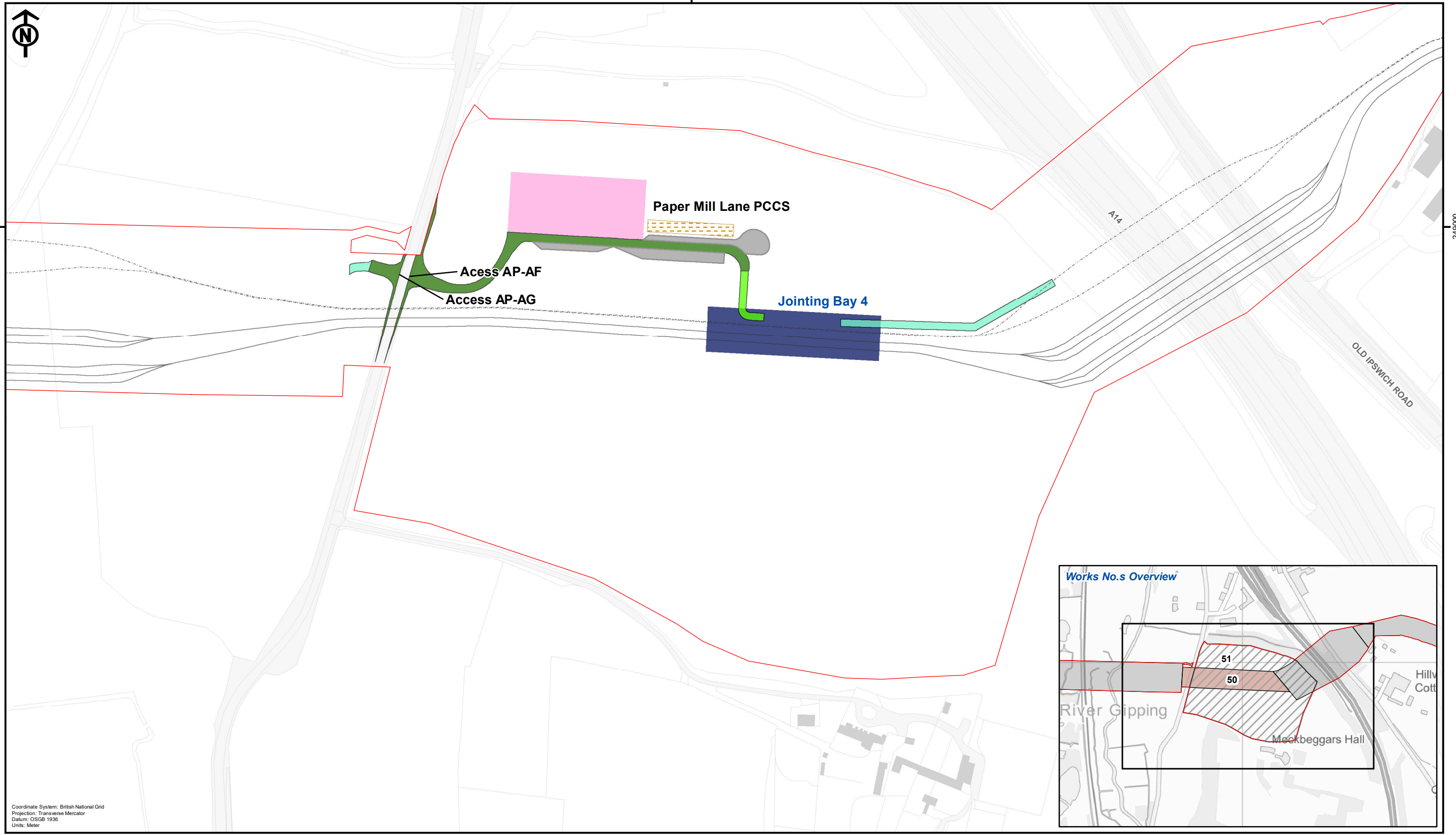


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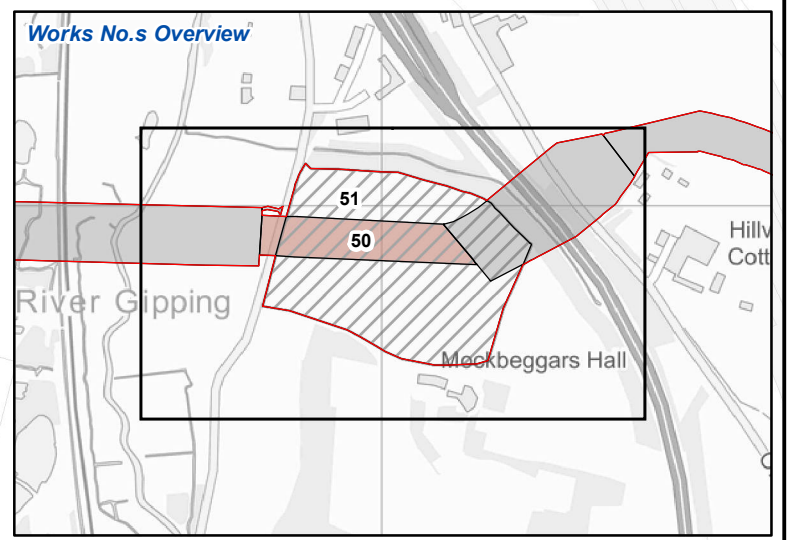


249000

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Coordinate System: British National Grid
 Projection: Transverse Mercator
 Datum: OSGB 1936
 Units: Meter



EA THREE DCO Corridor	HGV Turning, Cleaning and Washing	EA THREE Existing Cable Ducts	Works No.s 50 51
Primary Construction Consolidation Site	Trackway	EA ONE Existing Cable Ducts	
Jointing Bay Compound	Access Track		
Top Soil	Haul Road		



Rev	Date	By	Comment
B	05/04/2022	PW	Second Issue
A	31/03/2022	JRS	First Issue

Original A3 Plot Scale 1:2,500

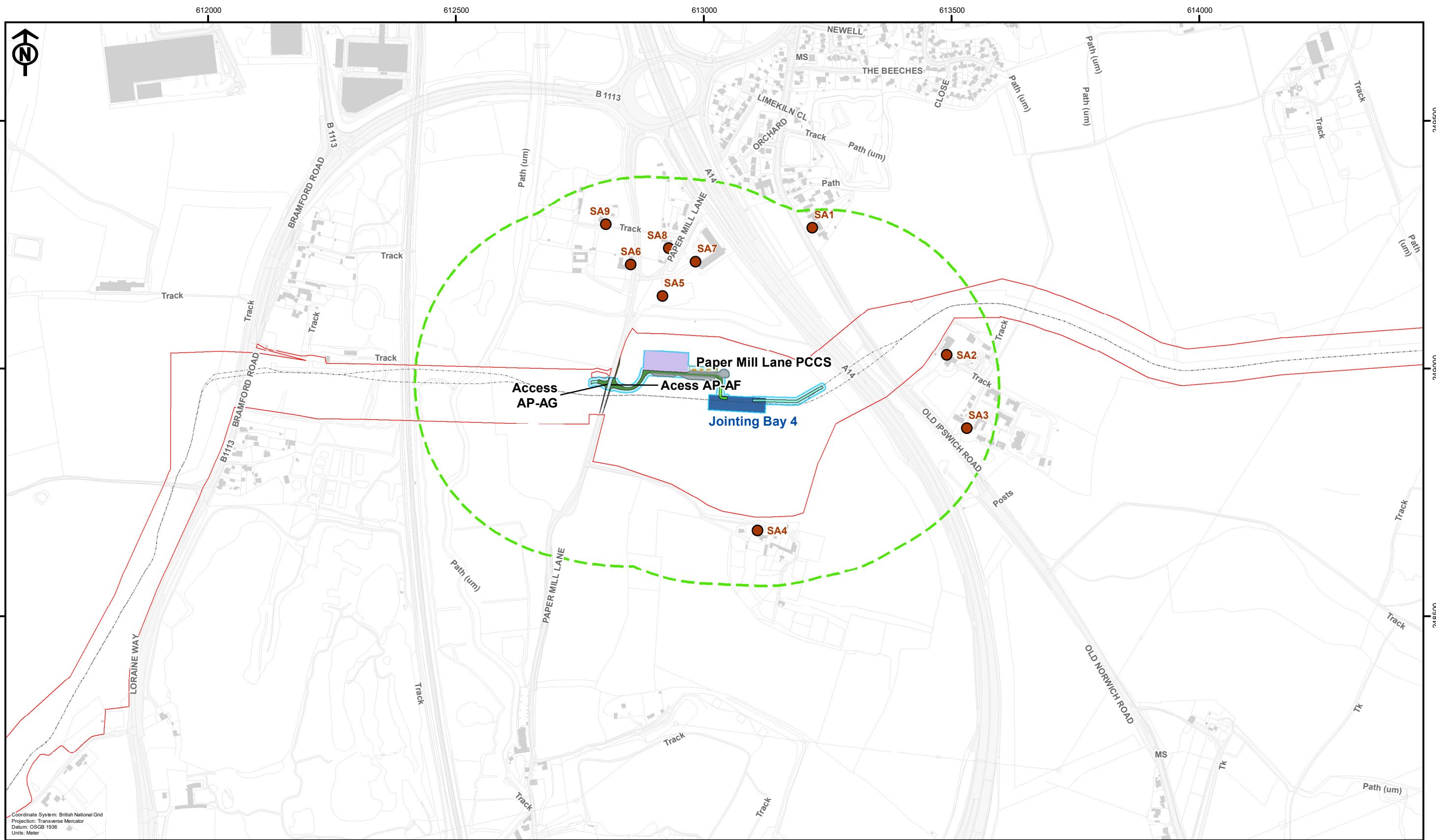
0 50 100 Metres

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 NOT TO BE USED FOR NAVIGATION.

Paper Mill Lane Works Stage

Figure 1: Site Context Plan

Drg No	05356.00006.12.0021.1 Site Context Plan
Rev	2
Date	05/04/2022
Layout	N/A



Coordinate System: British National Grid
 Projection: Transverse Mercator
 Datum: OSGB 1936
 Units: Meter

EA THREE DCO Corridor	HGV Turning, Cleaning and Washing	EA THREE Existing Cable Ducts
Primary Construction Consolidation Site	Trackway	Extent of Potential Dust Sources
Jointing Bay Compound	Access Track	Extent of Potential Dust Effect
Top Soil	Haul Road	Sensitive Area



Rev	Date	By	Comment
B	06/04/2022	PW	Second Issue
A	20/12/2021	PW	First Issue

Original A3 Plot Scale 1:7,500

0 150 300 Metres

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 NOT TO BE USED FOR NAVIGATION.

Paper Mill Lane Works Stage
 Figure 2: Air Quality Sensitive Areas

Drg No	05356.00006.12.0022.1 Air Quality Sensitive Areas
Rev	2
Date	05/04/2022
Layout	N/A