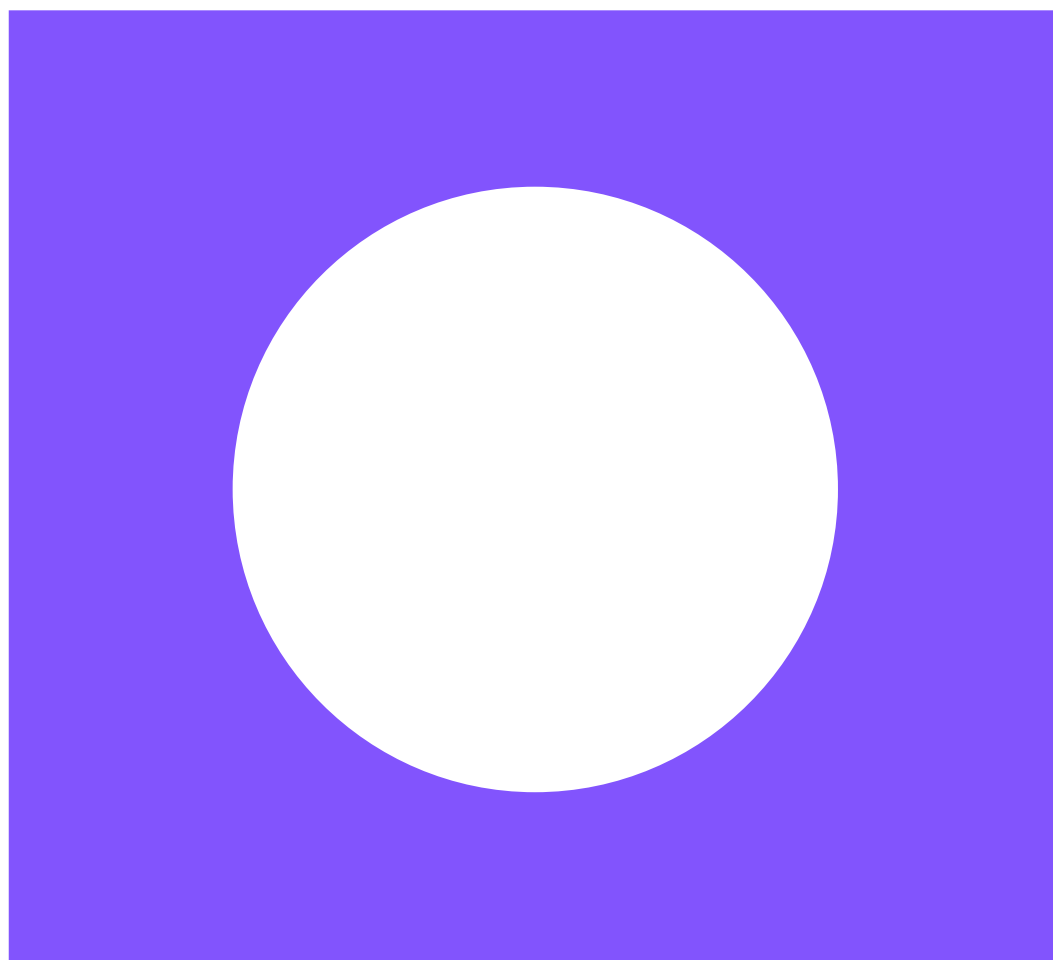




# **Queen Victoria Hospital Construction Environmental Management Plan**

June 2025

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# **Queen Victoria Hospital Construction Environmental Management Plan**

June 2025

# Issue and Revision Record

| Revision | Date     | Originator | Checker     | Approver | Description       |
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| 1        | 01/07/25 | P.Thomson  | M.Hartridge | B.Mulley | For client review |
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# Acronyms and Abbreviations

|              |                                                       |
|--------------|-------------------------------------------------------|
| <b>AQMA</b>  | Air Quality Management Areas                          |
| <b>BNG</b>   | Biodiversity Net Gain                                 |
| <b>BSI</b>   | British Standards Institution                         |
| <b>BU</b>    | Biodiversity Units                                    |
| <b>CDC</b>   | Community Diagnostic Centre                           |
| <b>CEMP</b>  | Construction Environmental Management Plan            |
| <b>CEZ</b>   | Construction Exclusion Zone                           |
| <b>COSHH</b> | Control of substances hazardous to health regulations |
| <b>DMP</b>   | Dust Management Plan                                  |
| <b>ECow</b>  | Ecological Clerk of Works                             |
| <b>GCN</b>   | Great Crested Newts                                   |
| <b>IAQM</b>  | Institute of Air Quality Management                   |
| <b>INNS</b>  | Invasive Non-native Species                           |
| <b>OSGR</b>  | Ordnance Survey Grid Reference                        |
| <b>PEA</b>   | Preliminary Ecological Appraisal                      |
| <b>PPE</b>   | Personal Protective Equipment                         |
| <b>PPG</b>   | Pollution Prevention Guidelines                       |
| <b>PRoW</b>  | Public Right of Way                                   |
| <b>QVH</b>   | Queen Victoria Hospital                               |
| <b>RAMS</b>  | Risk Assessment and Method Statement                  |
| <b>RPA</b>   | Root Protection Area                                  |
| <b>SuDS</b>  | Sustainable Drainage System                           |
| <b>UXO</b>   | Unexploded ordnance                                   |



# 1 Introduction

This Construction Environmental Management Plan (CEMP) has been prepared by Mott MacDonald, the Consultant, on behalf of NHS (hereafter, the 'Client'), to detail the environmental controls that are to be implemented in partnership with the appointed Principal Contractor in the undertaking of construction activities related to the new building at the Queen Victoria Hospital (QVH) site in East Grinstead (hereafter the 'project').

## 1.1 Purpose of the CEMP

This CEMP provides a framework:

- For the management of environmental performance throughout the construction phase of the project delivery to avoid, minimise or mitigate construction effects on the environment;
- To ensure that all statutory and planning environmental commitments, objectives and targets are communicated to all construction staff, including Sub-Contractors; and
- To ensure compliance is monitored and reported.

The document outlines the mitigation and management requirements to be implemented by the Principal Contractor responsible for the construction of the project.

This CEMP is to be reviewed and updated periodically to ensure all environmental risks are identified and mitigated. The responsibility of updating the CEMP lies with the Environmental Manager.

## 1.2 Supporting Information

This CEMP has been prepared taking into consideration the findings and recommendations outlined in the following documents:

| Document reference                | Document title                                |
|-----------------------------------|-----------------------------------------------|
| 100120806-MMD-ZZ-ZZ-DOC-EN-000002 | Preliminary Ecological Appraisal              |
| 100120806-MM-ZZ-EG-RP-EN-0003     | Biodiversity Net Gain Design Stage Report     |
| 100120806-MM-ZZ-EG-RP-EN-0007     | Arboriculture Report                          |
| 100120806-MM-ZZ-EG-RP-EN-0006     | Air Quality Assessment                        |
| 100120806-MM-ZZ-EG-RP-EN-0004     | Flood Risk Assessment                         |
| 100120806-MM-XX-EG-RP-PL-0001     | Planning Statement                            |
| 100120806-MM-ZZ-EG-RP-AE-0002     | Noise Impact Assessment                       |
| 100120806-MM-ZZ-EG-DOC-TP-0001    | Transport Statement                           |
| 100120806-MM-ZZ-EG-RP-EN-0005     | Heritage Statement                            |
| 100120806-MM-ZZ-EG-PA-EN-0004     | Landscape and Visual Impact Assessment (LVIA) |
| 100120806-MM-ZZ-EG-RP-BM-0002     | Energy and Sustainability Statement           |

## 1.3 Scope of the CEMP

Measures identified throughout the CEMP are to be considered mandatory and embedded within the Principal Contractor's policies and site procedures. The CEMP takes account of specific planning condition requirements, the final construction method and feedback from engagement with stakeholders and communities.

The CEMP describes how environmental requirements will be managed for the project and specifies controls that will be implemented on site, including:

- Mitigation measures to control and where possible minimise, the environmental impacts of the construction work;
- Any licences that are in place and their conditions (including post planning conditions) to demonstrate compliance with all relevant legal, regulatory and corporate requirements;
- Best practice measures and pollution prevention plans to ensure that good construction practices are adopted throughout the construction phase; and
- A framework for handling complaints and mitigating impacts that may be unforeseen or that are not identified until construction is underway.

## 1.4 Legislation and Compliance

There are various legislative requirements that require compliance throughout the construction phase of the project. A.1, provides a list of legislation, policies, and permissions that may be applicable throughout the construction phase of the project. This is not an exhaustive list, and a full list will be maintained throughout the construction phase, through on-going review and update of the CEMP.

## 1.5 Project Overview

### 1.5.1 Project background

The project will be a single storey structure with a Gross Internal Area (GIA) of approximately 740sqm, comprising of Community Diagnostic Centre (CDC) with diagnostics and treatment facilities, ancillary facilities and associated access. The CDC is intended to support the existing diagnostics and treatment facilities at QVH. It will provide five generic treatment rooms, supported by clinical support facilities and staff support spaces, as well as patient waiting facilities.

The proposed location for the CDC is on the green space at the entrance to the existing hospital site in front and to the east of the existing Jubilee Building.

### 1.5.2 Construction overview

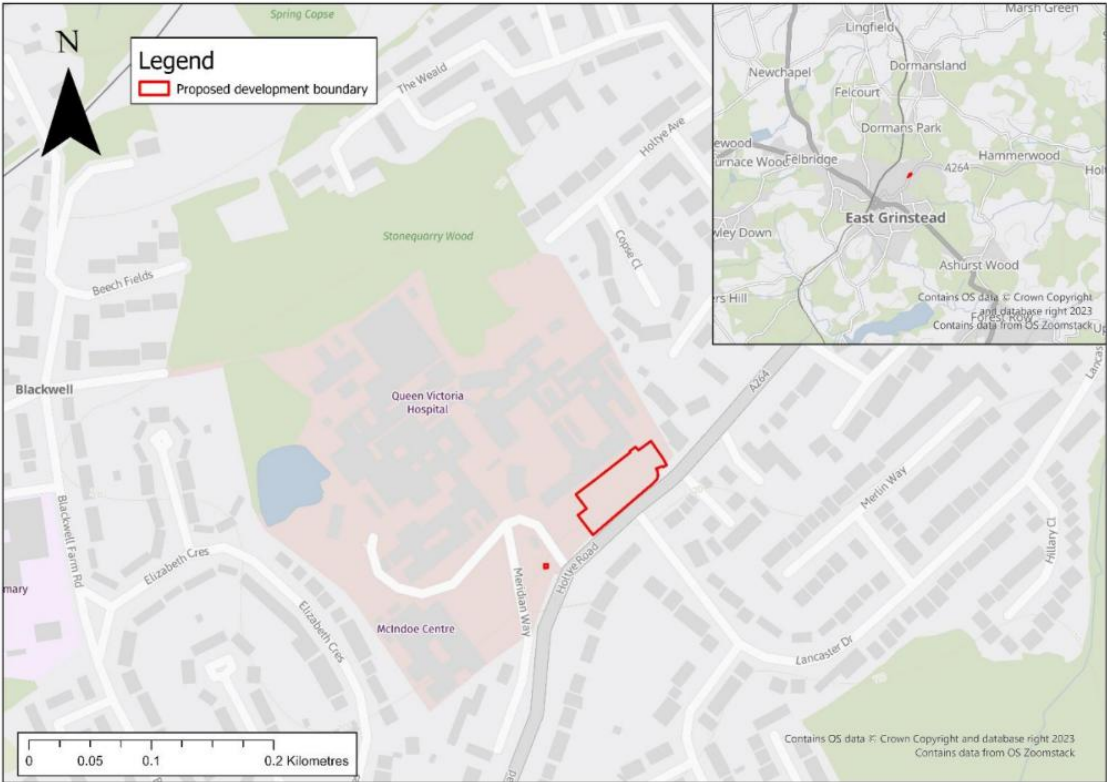
Detail on construction methods will be provided by the Principal Contractor before final issue of the CEMP.

### 1.5.3 Location, site and surrounding

The project is located at the existing QVH, Holtye Road (A264), East Grinstead, West Sussex, RH19 3DZ, centred at Ordnance Survey Grid Reference (OSGR) TQ 39993 39188. The location of the project is shown in Figure 1.1.

To the west, the site adjoins an access road leading to the QVH car park, with multiple healthcare facilities on the remainder of the site towards the north and northwest. The wider surrounding areas include further car parks, walkways, public green spaces and smaller parks to the northwest of the project. The project is bound by residential properties to the east, west and south.

Figure 1.1: Project location



Source: Mott MacDonald, 2024.

1.5.4 Project details

| Project:                         | QVH Project Details                                |
|----------------------------------|----------------------------------------------------|
| Proposed Construction Start Date | 29/07/25                                           |
| Proposed Completion Date         | 03/04/26                                           |
| Client                           | NHS                                                |
| Client Representative            | TBC                                                |
| Principal Contractor             | TBC                                                |
| Contractor Representative        | TBC                                                |
| LPA Representative               | Zhivko Vasilev (Contracts Manager)<br>07912 309062 |
| Local Authority                  | West Sussex County Council<br>01243777807          |

## 2 Environmental Management

### Environmental Management Systems

It is anticipated that the Principal Contractor will be accredited to ISO 14001: 2015 Environmental Management System (EMS) or similar. The project will be undertaken in accordance with this EMS. The project will also be undertaken in accordance with NHS Environmental Policy.

All project specific environmental information will be kept and be clearly visible in the site office and available for inspection.

The Principal Contractor will monitor their own environmental activities on a regular basis and ensure the results are documented in accordance with Section 6 of this CEMP.

All environmental responsibilities are detailed within Section 3.

### 2.1 Project objective and targets

The NHS have a commitment to net zero, to achieve this the following targets have been set out:

- For the emissions the NHS control directly (the NHS Carbon Footprint<sup>1</sup>), they will reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032; and
- For the emissions the NHS can influence (our NHS Carbon Footprint Plus), they will reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.

Detail on the objectives and targets of the Principal Contractor to be provided and added here before final issue of the CEMP.

---

<sup>1</sup> Delivering a net zero NHS, NHS England (2022) [Greener NHS » Delivering a net zero NHS](#)

## 3 Role and responsibilities

It will be the responsibility of everyone on site to ensure the environment is protected for the duration of the project. To manage this effectively, key individuals will be assigned specific responsibilities to ensure that all persons employed on the project know the responsibilities expected of them. The Client and the Principal Contractor are both responsible for the safe and environmentally compliant delivery of the project. These organisations will ensure that effective control is established on site to manage activities within the framework of this CEMP. This sections provides a preliminary indication of roles, responsibilities, and training requirements.

### 3.1 Key project contacts

Once roles have been allocated to the relevant individuals and parties, the information should include the name, job title and organisation of people undertaking the key roles, likely to include the following, but not limited to:

- Client's Project Manager;
- Principal Contractor;
- Contractor Project Manager;
- Construction Site Manager;
- Environmental Manager; and
- Ecological Clerk of Works (ECoW).

The key contact information should be made available on notice boards within the site compound throughout the construction phase and should be provided to all new workers, Sub-Contractors, and visitors to site during their site induction. Appointments will be reviewed and updated throughout the project, reflecting any changes or movement in the project as required. Changes in responsibilities will be administered through and recorded in this document.

#### 3.1.1 Client's Project Manager

The Client's appointed Project Manager accepts the CEMP.

The Project Manager's environmental responsibilities include:

- Identifying and approving the environmental competence of the Principal Contractor and all Sub-Contractors to be employed for the project;
- Reviewing and accepting the CEMP;
- Reviewing and accepting construction method statements with regard to environmental aspects prior to works commencing; The Contractor is to submit method statements 14 days prior to the works commencing.
- Oversight of the monitoring the implementation of the CEMP throughout the construction of the project; and
- Ensuring that the Principal Contractor is aware of their project-specific environmental responsibilities and that the Principal Contractor puts appropriate measures in place, reporting to the Client as necessary.

[To be confirmed with Client]

#### 3.1.2 Principal Contractor

The Principal Contractor holds overall accountability for day-to-day activities on site. The Principal Contractor is responsible for ensuring that all responsible persons named in this

CEMP and members of the project team on site, including Sub-Contractors, comply with the procedures set out in the CEMP. The Principal Contractor will ensure that all persons working on site are provided with sufficient training, supervision, equipment, and instruction to fulfil this requirement.

The Principal Contractor should ensure that all persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

The Principal Contractor should execute the work and take on direct responsibility for implementation of the CEMP.

### 3.1.3 Contractor's Project Manager

The Contractor's Project Manager is responsible for overseeing the overall planning and delivery of the project. The Contractor's Project Manager's environmental responsibilities include but are not limited to:

- Overarching responsibility for the implementation of environmental requirements associated with the design and construction;
- Reporting on environmental performance and compliance to the Client;
- Supporting the Principal Environmental Manager in preparing the CEMP, construction method statements, work instructions and other procedures;
- Identifying the competencies of all staff and ensuring delivery of training (including environmental training) to the project team;
- Reviewing and improving method statements for environmental aspects prior to works starting;
- Monitoring of the programme for the environmental works, and the provision of status reports as necessary; and
- Providing advice and liaising with construction teams to ensure that environmental risks are identified, and appropriate controls developed on site.

### 3.1.4 Construction Site Manager

The Site Manager is responsible for the day-to-day operation of the site, including adhering to the relevant health and site procedures and ensuring all site staff are briefed on matters. The Construction Site Manager's environmental responsibilities include but are not limited to:

- Close liaison with the Environmental Manager to ensure adequate resources are made available for implementation of the CEMP; on a day-to-day basis;
- Ensuring that the risk assessments for control of substances hazardous to health regulations (COSHH), noise and environmental risk method statements (sometimes known as activity plans) are prepared and effectively monitored, reviewed and communicated on site;
- Managing the preparation and implementation of method statements;
- Ensuring the Environmental Manager reviews all method statements and that the relevant environmental protocols are incorporated;
- Ensuring training inductions, training, and toolbox talks are undertaken by all required staff; and
- Weekly (as a minimum) walk arounds of the site to undertake site inspections.

### 3.1.5 Environmental Manager

The Environmental Manager is responsible for carrying out monthly site inspections during construction and recording this in the form of a short report with photographic evidence,

ensuring that best environmental practice and compliance is adhered to throughout the duration of the works.

The Environmental Manager is responsible for overseeing implementation of the planning conditions, regulatory requirements and consents, and the requirements of the CEMP. They will also be required to review and update the CEMP throughout the project where necessary.

The Environmental Manager is responsible for ensuring all relevant stakeholder liaison and management of environmental constraints are in line with procedures set out in the CEMP. This role includes:

- The provision of technical guidance on legislative and best practice measures to be implemented;
- Review and update the CEMP throughout the construction process, as required, such as a change in construction methodology or if an unidentified environmental issue is identified;
- Monitoring of activities and highlighting areas for improvement;
- Assistance in the occurrence of environmental incidents;
- Developing environmental materials and information for inductions, training, and toolbox talks;
- Conducting training sessions (including inductions and toolbox talks) and contributing to developing training material;
- Ensuring environmental incidents are appropriately reported both internally and to statutory authorities;
- Conducting audits to ensure compliance with the organisation's environmental standards;
- On site advice, reporting and investigation of all environmental incidents; and
- Liaise with the ECoW, when they are required on site.

It is understood that the Environmental Manager responsibilities will be undertaken by the Construction Site Manager and should any further requirements for specialist technical supervision be identified, an Ecological Clerk of Works (ECoW) or appropriate specialist would oversee the works.

### 3.1.6 Ecological Clerk of Works

The role of the ECoW is to oversee any works that may affect sensitive environmental receptors and resources as identified within this CEMP.

An ECoW will be required to undertake a check for nesting birds prior to any suitable habitat being removed during nesting bird season (March to September inclusive).

This may not be a full-time site-based role and would only be required when construction works that might affect protected species and habitats are anticipated. The ECoW will be responsible for ensuring the Principal Contractor is undertaking works legally and in a sensitive way for protected species, habitats and landscapes within and around the site location.

## 3.2 Environmental training

The Principal Contractor is responsible for providing ongoing environmental awareness training and toolbox talks as appropriate throughout the project, with support from the Environmental Manager. A record of all training undertaken will be captured using the Contractor's system INNDEX, covering all site specific issues. The Principal Contractor is also responsible for providing and recording attendance at environmental training at the commencement of, and throughout, the construction phase of the project.

The following toolbox talks may be conducted during construction:

- Pollution prevention best practice;
- Environmental incidents identification and reporting;
- Biodiversity and ecology (bats, great crested newts, invasive non-native species, widespread amphibians and nesting birds); and
- Spill control and use of spill kit;
- Dust and air quality;
- Water resource management;
- Storage and use of fuel, oils and chemicals;
- Waste management;
- Plant and machinery wash down;
- Noise and vibration management;
- General site Housekeeping; and
- Nuisance.

Any additional toolbox talks would be identified by the Environmental Manager, and delivered as required.

Training should be provided by the Environment Manager and/or Construction Site Manager as appropriate to ensure that all persons working on site have a practical understanding of environmental issues and management requirements prior to commencing activities.

The Environmental Manager is to review and prepare a Risk Assessment and Method Statement (RAMS) prior to the works commencing by the Principal Contractor. These are to be activity specific and should include environmental protection actions, mitigation measures, and appropriate emergency preparedness procedures. The Construction Site Manager should review the RAMS prior to their issue.

### 3.2.1 Site induction

All personnel involved in construction of the project will receive environmental awareness training as part of the site induction. The environmental training and awareness procedure will ensure that staff are familiar with the principles of the CEMP, the environmental constraints at the site, and the mitigation required to reduce environmental impacts.

## 3.3 Communication

To ensure effective environmental communication, the CEMP will be distributed to the project team, including any Sub-Contractors. Key activities and any environmentally sensitive operations shall also be briefed to all staff. Environmental policies for the project, client, and company are to be displayed onsite in regularly utilised locations.

Throughout construction, progress meetings will be held on a monthly basis between the relevant key site team. These meetings will include environmental aspects associated with the construction works and general site management. The Environmental Manager is to undertake environmental audits on a monthly basis as a minimum. A monthly report will be completed by the Principal Contractor to note outcomes of any audits that have been undertaken in the previous month.

Progress meetings should cover:

- Training undertaken and pending;
- Progress reports, inspections, audits, and non-conformance;
- Complaints received;

- Third party visits, outcomes, and feedback; and
- Target achievement, including reporting on environmental performance.

### 3.4 Sub-Contractors and suppliers

Sub-Contractors are to be appointed in accordance with the Principal Contractors' procedures, which include environmental criteria.

The Principal Contractor is responsible for overseeing the environmental compliance of all Sub-Contractors and suppliers. The CEMP should be issued to all Sub-Contractors and suppliers to ensure they are fully aware of the site controls and responsibilities.

Sub-Contractors are required to work in accordance with the CEMP, using it to prepare their own RAMS. All Sub-Contractor RAMS are to be approved by the Principal Contractor.

## 4 Key Environmental Constraints

### 4.1 Site constraints

Site constraints are considered factors that are likely to have impacts upon the project or its construction, such as flood risk, soils and geology, and nearby properties.

Table 4.1 provides a list of identified construction phase constraints based on the environmental studies undertaken to date (as referred to in Section 1.2: Supporting Information). Only constraints identified in the environmental studies relevant to the construction phase of the project are included. See A.2 for an Environmental Constraints Map of the project site.

**Table 4.1: Site constraints**

| Environmental Aspect | Key Constraints |
|----------------------|-----------------|
|----------------------|-----------------|

|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Air Quality   | <p>There are no designations for air quality, such as Air Quality Management Areas (AQMA) within 1km of the project.</p> <p>The nearest receptors to the project that could be impacted by emissions to air include:</p> <ul style="list-style-type: none"><li>• Staff, patients and visitors of the QVH;</li><li>• Residential properties, the closest of which is 113 Holtje Road (A264), located approximately 15m east of the project;</li><li>• Commercial premises, the closest is Spitfire Café, located within the QVH grounds, approximately 90m northeast;</li><li>• Users of the Public Right of Way (PRoW), approximately 60m east of the project; and</li><li>• Ecological receptors identified below.</li></ul> |
| Arboriculture | <p>The site is characterised as an existing hospital, surrounded by predominantly a residential area. The site is currently an area of managed grassland with hedges and clusters of trees delineating the border.</p> <p>A total of 10 trees ranging from early mature/semi mature and mature will be removed as part of the project. Additionally, the removal of two hedges ranging from early mature to mature will be removed due to the direct conflict with the proposed building. There will also be partial removal of another hedge. Additional information can be found within the QVH CDCs: East Grinstead - Arboriculture Report (100120806-MM-ZZ-EG-RP-EN-0007).</p>                                            |
| Ecology       | <p>The scattered trees and hedgerows within the site provide suitable nesting bird habitat.</p> <p>There is a pond approximately 200m northwest of the site that has a known great crested newt population. However, the habitats within the site are not typically suitable for great crested newts or widespread amphibians.</p> <p>A tree approximately 30m west of the site has bat roost potential, along with one building immediately north of the site. The tree lines bordering the site may also</p>                                                                                                                                                                                                                |

support foraging and commuting bats. The tree identified as having bat roost potential is not due to be removed as part of the project.

Rhododendron, a Schedule 9 species under the Wildlife and Countryside Act 1981, is present within the site. Cherry laurel and snowberry, whilst not Schedule 9 species, are non-native and invasive and are also present within the site.

For a more detailed description of the ecological constraints associated with the project see the Preliminary Ecological Appraisal (100120806-MMD-ZZ-ZZ-DOC-EN-000002).

#### Historic Environment

There are 68 listed buildings within 2km of the project, two being Grade I listed buildings, 61 of these being Grade II listed buildings, and five being Grade II\* listed buildings. The closest listed building is Saint Margarets Convent, located approximately 830m southwest of the project.

Within the 2km of the project, there are two Conservation Areas, the closest being Estcots and East Court, located approximately 550m south of the project. The second is East Grinstead 1971, located approximately 1km south of the project.

A Registered Park and Garden, Brockhurst is located approximately 1.6km south of the project.

#### Land Quality

There are four historical landfills located within the 2km buffer zone. The closest is approximately 580 to the northeast of the project. There are no active landfill sites within 2km of the project.

Land quality receptors include users of the project and surrounding area (QVH staff, patients and visitors, residents, pedestrians, commercial, construction and maintenance workers, etc.).

#### Landscape and Visual

There are no key landscape designations within 2km of the project.

Landscape and visual receptors include:

- Pedestrians, cyclists and motorists along Holtye Road (A264);
- Staff, patients and visitors of the QVH;
- Users of the commercial premises, the closest is Spitfire Café, located within the QVH grounds, approximately 90m northeast; and
- Residents of residential properties, the closest of which is 113 Holtye Road (A264), located approximately 15m east of the project.

#### Noise and Vibration

The project is located partially within, and directly adjacent to, an operational hospital surrounded by residential properties and roads, due to this noise levels are likely to be low.

Nearby sensitive receptors to noise and vibration include:

- Residential properties, the closest of which is 113 Holtye Road;(A264), located approximately 15m east of the project
- Staff, patients and visitors of the QVH;
- Commercial premises, the closest is Spitfire Café, located within the QVH grounds, approximately 90m northeast;
- Users of the PRoW, approximately 60m east of the project; and
- Ecological receptors listed above.

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               | <p>Planning condition:</p> <p>Noise Control (operational plant and machinery) will meet the noise levels specified in the planning conditions for this project. The rating level of the noise emitted from fixed plant and equipment (mechanical and electrical) located at the site to be in line with statutory requirements.</p>                                                                                                                                         |
| Traffic, Transport and Access | <p>The operational QVH is currently accessed via Holtye Road (A264).</p> <p>A PRoW is located approximately 60m east of the project.</p> <p>A bus stop is located on the Holtye Road (A264) (Queen Victoria Hospital Stops). The northbound bus stop is located directly south of the project, the southbound bus stop is located approximately 220m from the project. For further information, refer to QVH CDC: Transport Statement (100120806-MM-ZZ-EG-DOC-TP-0001).</p> |
| Water Resources               | <p>The nearest watercourse is an unnamed watercourse located to the south of Lynton Park Avenue extending into Ashplats Wood approximately 350m southeast of the site.</p> <p>The geology beneath the project is characterised as a Secondary A Bedrock Aquifer and an unknown Superficial Deposits Aquifer.</p> <p>The project is entirely located within Flood Zone 2.</p>                                                                                                |

## 5 Environmental control measures

All activities on site throughout the construction period will be controlled, as far as reasonably practical, to prevent or minimise environmental impacts.

### 5.1 Legislative requirements

As a minimum, the Principal Contractor will be required to comply with applicable environmental legislation at the time of construction of the project, as relevant. Relevant legislation includes, but is not limited to, the following:

- Control of Pollution Act 1974;
- Environmental Protection Act 1990;
- Environment Act 2021;
- Wildlife and Countryside Act 1981 (as amended);
- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wild Mammals (Protection) Act 1996;
- Invasive Alien Species (Permitting and Enforcement) Order 2019;
- Water Act 1974; and
- Waste (England and Wales) Regulations 2011.

### 5.2 Consents and permits

A review of the Mid Sussex District Council Local List of Validation Requirements was undertaken to determine the submission requirements for the planning application. A suite of supporting documentation has been prepared to provide the Local Planning Authority with sufficient information to determine the planning application.

The planning permission for the project was granted on 16<sup>th</sup> April 2025 and expires 16<sup>th</sup> April 2028.

Further detail on consents and permits required for the project will be provided by the Principal Contractor prior to the final issue of this CEMP.

### 5.3 General site management

#### 5.3.1 Construction working hours

All construction works will be undertaken during core working hours only. Core working hours are as follows:

- 08:00 to 18:00 Monday-Friday; and
- 08:00 to 13:00 Saturday.

There will be no works on Sundays or bank/public holidays, except for any emergency works that may be required.

#### 5.3.2 Deliveries

Deliveries or collection of plant, equipment or materials for use during the construction phase shall be limited to the following times:

- 08:00 to 18:00 Monday-Friday; and

- 08:00 to 13:00 Saturday.

There will be no deliveries on Sundays or bank/public holidays.

### 5.3.3 Traffic management

The following best practice measures should be adopted on site to minimise impacts from traffic and vehicle movements:

- Deliveries will be made within the agreed working hours to ensure access to the site is available and there should be no queuing on the road;
- Obstructing the highway by the reversing or parking of construction vehicles onto the public highways should not be permitted, and all construction workers and visitors will also to adhere to this;
- Materials and equipment will be stored on site to minimise unnecessary traffic movements;
- Where possible the site operatives and Principal Contractor will be encouraged to use public transport or use car sharing;
- If required, vehicle access will be controlled using an appropriate traffic marshalling (gateman/banksman) responsible for managing vehicle movements in and around the site; and
- All site accesses will be robust level hard-standings, to be kept clean, well signed and controlled. Entry gates will be closed at all times when access is not required. Appropriate signage will be fixed to the gate(s).

## 6 Project Specific Environmental Management

This section outlines the measures to be undertaken to manage and mitigate the preliminary environmental issues associated with the project as identified through the planning application and supporting documents.

This CEMP has considered the impacts from construction effects and associated construction management measures that are required from the documents identified in Section 1.2 of this report and through best practice. The following control measures should be read in conjunction with the full reports.

### 6.1 Air quality

Construction activities are to be managed in accordance with best practice, including mitigation set out in the Institute of Air Quality Management (IAQM) guidelines<sup>2</sup>.

#### 6.1.1 Site management

- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary;
- Display the head or regional office contact information;
- Record all dust and air quality complaints, identify cause, take appropriate measures to reduce emissions in a timely manner, and record the measures taken;
- Make the complaints log available to the local authorities when asked; and
- Record any exceptional incidents that cause dust and/or air emissions, either on or off site, and the actions taken to resolve the situation.

#### 6.1.2 Monitoring

- Undertake weekly on site and off site inspections, where receptors (including roads) are nearby, to monitor dust, record inspections results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture adjacent to the site boundary, with cleaning to be provided if necessary;
- Carry out regular site inspections to monitor compliance with the Dust Management Plan (DMP) which will be found within the Construction Phase Plan (CPP). The DMP will record inspection results, and make an inspection log available to the local authority when asked; and
- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

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<sup>2</sup> Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management (2014) <http://iaqm.co.uk/text/guidance/construction-dust-2014.pdf>.

### 6.1.3 Preparing and maintaining site

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as it is possible;
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site;
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period;
- Avoid site runoff of water or mud;
- Keep site fencing, barriers, and scaffolding clean using wet methods;
- Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site; and
- Cover, seed, or fence stockpiles to prevent wind-whipping.

### 6.1.4 Operating vehicle/machinery and sustainable travel

- Ensure all vehicles switch off engines when stationary, no idling vehicles;
- Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practical; and
- Impose and signpost a maximum speed limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).

### 6.1.5 Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction;
- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate;
- Use enclosed chutes and conveyors and skips;
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate; and
- 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.

### 6.1.6 Waste management

- No bonfires and burning of waste materials.

### 6.1.7 Construction

- Avoid scabbling (roughness of concrete surfaces) if possible; and
- 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.

### 6.1.8 Trackout

- Avoid dry sweeping of large areas;
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport;
- Record all inspections of haul routes and any subsequent action in a site logbook; and

- Implement a wheel washing system with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

## 6.2 Ecology

A Preliminary Ecological Appraisal (PEA) and UK Habitat Classification (UKHab) survey was undertaken by Mott MacDonald in July 2024 (Doc ref: 100120806-MMD-ZZ-ZZ-DOC-EN-000002). A bat endoscope survey was also undertaken of features with bat potential within the initial survey. This was carried out on 18 September 2024, and the results are presented within the PEA. A Biodiversity Net Gain (BNG) Design Stage Report was also completed in January 2025 (Doc ref: 100120806-MM-ZZ-EG-RP-EN-0003).

The below listed environmental control measures are provided to avoid/reduce impacts on protected or notable species during construction. These include additional ecological surveys and mitigation.

### 6.2.1 Biodiversity protection zone

Biodiversity protection zones should be set up around the following features, with no works occurring in these areas;

- A 20m radius around the tree identified to have bat roosting potential (100120806-MMD-ZZ-ZZ-DOC-EN-000002; TN1); and
- A 7m radius around the Rhododendron, cherry laurel *Prunus laurocerasus* and snowberry *Symphoricarpos albus*. If this cannot be done, then mitigation outlined in Section 6.2.4.1 should be followed.

### 6.2.2 Practical measures

The following practical measures that should be undertaken to avoid/reduce the impacts on protected/notable species during the project:

- A nesting bird check to be carried out prior to any removal of trees or hedgerow, if the timing in Section 6.2.3 cannot be followed. An ECoW should be present onsite to carry this out within 48 hours prior to removal;
- Suitable removal of any Invasive Non-Native Species (INNS) from the site (see Section 6.2.5.1 for further details). Any contaminated material kept onsite should be fenced off and labelled with an appropriate sign;
- A sensitive lighting design should be used to avoid impacting bats (see Section 6.2.4.3 for further details);
- Noise reducing fencing should be used around the northern boundary of the site (see Section 6.2.4.3 for further details); and
- No cut vegetation should be stored onsite in log/brush piles.

### 6.2.3 Timing of sensitive works

Some works should be timed specifically to avoid impacting on protected/notable species. The following timings should be followed:

- Any removal of trees or hedgerow should be done outside of nesting bird season (March to September, inclusive). From the 1<sup>st</sup> October works are able to proceed without ecological supervision, however if nesting birds are found, all works must stop and advice be sought from an Ecologist. Further details on this can be found in 6.2.4.2.

## 6.2.4 Specific species and habitats

### 6.2.4.1 Invasive species

Rhododendron, an INNS listed under Schedule 9 of the Wildlife and Countryside Act 1981 was identified within the areas of introduced scrub within the site. It is an offence to allow the spread of this plant into surrounding habitat.

As such, should the removal of these shrubs be required as part of the works, the organic waste must be disposed of responsibly at a suitable waste facility. Additionally, cherry laurel and snowberry are also present on site and while not listed under Schedule 9 of the Wildlife and Countryside Act 1981, they are invasive in woodland settings. All non-native shrubs removed from site should be disposed of at suitable waste facilities, to avoid any chance of the organic matter being spread into surrounding habitats, particularly the ancient woodland to the north that lies within the hospital grounds.

The project may impact or disturb the introduced scrub on site containing the rhododendron. The following precautions are recommended to ensure rhododendron does not spread:

- All site staff members should be made aware of the location of the identified invasive species and the requirements around them via a toolbox talk, delivered by a suitably experienced ecologist;
- Ensure that INNS locations are incorporated within relevant site method statements;
- Where contaminated arisings or materials are located, signage should be erected to indicate them, and tape the areas off using ticker tape and pins/stakes;
- Personnel working on or between sites should ensure their clothing and footwear are cleaned where appropriate to prevent spread; and
- Stop work immediately within 7m of any identified stand. Report any discoveries of cotoneaster after works have started to your supervisor or the site management team;

If eradication of any INNS is required, an INNS Management Plan may be required, and would detail:

- The method of control that will be used, including details of post-control monitoring; and
- How the plant will be disposed of after treatment/removal.

### 6.2.4.2 Nesting birds

Vegetation shall only be removed where necessary. Where vegetation loss is unavoidable, it should be carried out outside of the nesting bird season (March to September, inclusive). If this is not possible, then the following will be required:

- Undertake pre-construction nesting bird checks to identify potential breeding habitat, within 48 hours prior to works commencing; and
- If nesting birds are located, either delay works until breeding attempts have finished and any fledged young are fully independent or have moved away; or mark an exclusion zone around bird nests or potential breeding habitat.

### 6.2.4.3 Bats

Night-time working will be avoided to prevent disturbance to commuting or foraging bats. If night-time working is required, then any lighting should follow best practice (Bat Conservation Trust and Institution of Lighting Professionals, 2018) and avoid light spill onto the potential foraging and commuting habitat, specifically the line of trees to the west of the site.

Using the guidance within the documents listed below will support the creation of a sensitive lighting design which minimises impacts on wildlife:

- Bat Conservation Trust & Institution of Lighting Engineers (2018) Guidance Note 8: Bats and Artificial Lighting in the UK;
- British Standards Institution (BSI) (2021) BS EN 12464-2: Light and Lighting - Lighting of Workplaces - Part 2: Outdoor Work Places; and
- Chartered Institution of Building Services Engineers (2016) Lighting Guidance 6: The Exterior Environment.

One tree and one building within the wider area of the site were identified to have bat roosting suitability. Neither are expected to be directly impacted by the works, but there is the potential for disturbance. Specific recommended measures are as follows:

- Avoid impacts on bat roosts by avoiding removal of the tree identified to have bat roosting potential (100120806-MMD-ZZ-ZZ-DOC-EN-000002; TN1). Works within 20m of this tree should also be avoided. If this can be avoided, then no disturbance is anticipated;
- Noise-reducing fencing should be used along the northern boundary of the construction site perimeter for the duration of works, to reduce any disturbance towards the building adjacent to the north which contains a potential roost feature (100120806-MMD-ZZ-ZZ-DOC-EN-000002; TN2); and
- All construction works should be restricted, where possible to daylight hours, to prevent any adverse impacts. If night work is essential this should avoid unnecessary disturbance by ensuring that the height of lighting columns are as low as possible; and that lighting hoods, cowls and shields are used to focus light into the working area and away from the surrounding environment.

#### 6.2.4.4 Great Crested Newts, widespread amphibians and reptiles

There is the potential for great crested newts to be within the wider area of the site, with a pond situated 0.2km northwest of the site known to have a population. However, there is a lack of habitat within the site itself that would be suitable for great crested newts. The same applies to widespread amphibians and reptiles; they are likely in the wider area but there is very limited suitable habitat present within the site.

Following the removal of shrubs and trees, the vegetation should not be stored on site as log/brush piles. This is to ensure there are no features which attract Great Crested Newts (GCN) or other amphibians to the site. Log piles and brush piles would, however, be suitable additions to other areas of site - within the immediate vicinity of the existing pond, for example. Should GCN or any amphibian be found at any time, works must stop, and an ecologist should be notified.

#### 6.2.5 Biodiversity enhancements

Mott MacDonald have undertaken Biodiversity Net Gain (BNG) calculations using the statutory biodiversity metric tool (SSM) (100120806-MM-ZZ-EG-RP-EN-0003). A BNG of at least 10% is required to comply with mandatory BNG and planning permission.

The site has been calculated to have a baseline biodiversity value of 2.30 Biodiversity Units (BU) for area-based habitats and 0.05 BU for hedgerows. In the SSM, the project will result in a -100% net unit change for both area-based habitats and hedgerows.

The project will result in habitat loss, with all the baseline habitat within the site being removed. There will be landscaping around the project, however this cannot be counted towards the BNG.

Existing habitats will be retained and incorporated into the landscape plan for the Site but as these habitats cannot be secured for a minimum of 30 years (due to operational constraints within the Site), these habitats will not contribute to BNG delivery. This will include grassland and individually planted trees.

In order to achieve a net gain of 10%, the required BU will be purchased from a habitat bank. This CEMP does not cover the off-site habitat bank area.

There will also be enhancements included within the site that are non-quantifiable within the BNG calculations. These will be included within a biodiversity enhancement layout plan. The following will be incorporated into the site post-development:

- Bird Boxes;
- Bat Boxes;
- Insect Hotel or 'natural features' for invertebrates; and
- Ecological considerations for the landscaping.

### 6.3 Historic environment

Construction activities could result in potential impacts on the historic environment, however the adoption of construction best practice measures will reduce potential effects.

Based on the results of the East Grinstead Heritage Statement (Doc ref:100120806-MM-ZZ-EG-RP-EN-0006), there is a low potential for archaeological remains to survive within the site. However, should any artifacts of historical significance be found during the works, construction is to stop and contact with the Environmental Manager is to be made.

### 6.4 Landscape and visual

Construction activities could result in potential impacts on landscape and visual amenity; however the adoption of construction best practice measures will reduce potential effects.

Based on the results of the Queen Victoria Hospital East Grinstead LVIA (Doc ref: 100120806-MM-ZZ-EG-PA-EN-0004), the site is in the suburban setting of East Grinstead, characterised by a mix of residential and light commercial use. The following measures are to be implemented:

- Site hoarding is to be inspected regularly by the Principal Contractor and kept in a suitable condition to reduce the visual impact on surrounding receptors;
- Reinstatement of vegetation removal will be undertaken as soon as reasonably practicable, in accordance with landscape plans;
- All trees that are to be retained are to be protected in accordance with Section 6.5; and
- Procurement, movement, handling, storage, planting, and maintenance of plant material will be in accordance with BS 3936-1, Nursery stock specification for trees and shrubs.

#### 6.4.1 Artificial Lighting

To mitigate the impact of lighting during construction the work will be scheduled for daylight hours, but the works may be lit during winter when typical working hours overlap with the hours of darkness.

Measures will be implemented to reduce obtrusive light. e.g. use of directional lighting, dimming or switching off lights where it is safe to do so, using specifically designed equipment and positioning lights sensibly.

## 6.5 Arboriculture

Construction activities could result in potential impacts on trees and hedges in and surrounding the site. However the adoption of construction best practice measures will reduce potential effects.

### 6.5.1 Temporary Protective Barriers

Ten trees have been identified by the Arboriculture Report (Doc ref: 100120806) as being in direct conflict with the project and will therefore require removal. The specific trees that will be impacted can be found in the Tree Protection Plan in **Error! Reference source not found.**

Tree protection barriers have been specified to protect retained trees in close proximity to the project. Barriers have been aligned on the Tree Protection Plan to encompass the maximum extent of the Root Protection Area (RPA) whilst still allowing facilitation of the current design and also so as not to conflict with the existing hardstanding of the site.

Protection barriers will ensure that construction can be undertaken without intruding into exposed sections of the RPA, remaining in place until the work has been completed.

The area within the tree protection barriers i.e. tree side, will be a 'Construction Exclusion Zone' for the duration of the works.

The following prohibitions shall also apply within the area enclosed by the temporary protective barriers:

- No mechanical digging or scraping;
- No storage of plant, equipment, or materials;
- No vehicular or plant access;
- No fire lighting within 10m of tree canopies;
- No handling, discharge, or spillage of any chemical substance, including cement washings and vehicle washings within 10m;
- No action likely to cause localised waterlogging;
- No alteration of ground levels;
- No construction of hard surfaces;
- No attachment of boards, hoarding, cables, or notices or fencing to trees; and
- No storage of excavated materials.

Special care is to be taken on sloping ground where spillages could run towards the trees. A collecting channel dug along the outer line of the protection fencing would be one method of avoiding such damage.

If excavators are to be used during construction, at no time is the excavating arm to encroach over the position of the tree protection barriers.

### 6.5.2 Ground protection measures

During construction, where pedestrian and vehicular tracking is required through the RPAs of any trees, the following recommendations should be adhered to in order to prevent adverse effects on the RPA:

- To minimise compaction, ensure that a suitable load - spreading surface in accordance with BS5837 2012 is always in place;

- Where only pedestrian traffic will occur, the ground protection measures shall be as simple as timber boards, or planks installed directly onto a geotextile fabric on the ground. The ground should first be made even by raking, or by adding a few centimetres of sand or woodchip;
- The below recommendations are cited from BS5837:2012:
  1. "Where only light machinery is to operate (e.g., barrows, trolleys, or occasional cars), thick wooden boards or scaffold planks should also suffice, though at least compressible woodchip will need to be installed first to help spread the load."
  2. "For wheeled or tracked construction traffic exceeding 2t gross weight, an alternative system (e.g. proprietary systems or pre-cast reinforced concrete slabs) to an engineering specification designed in conjunction with arboricultural advice, to accommodate the likely loading to which it will be subjected, will be required."
  3. "The ground protection measures shall be approved by the project Arboriculturist and installed before commencement of construction activities and before the arrival of plant machinery or materials. They shall remain in place until all construction activity is complete or until they are due to be replaced with a new hard surface."

### 6.5.3 No-dig cellular confinement systems

Cellweb is a cellular confinement system i.e. a web of geotextiles filled with clean granular fill, used to create a surface that spreads the weight of the design. The benefit of this system is that it is installed by building up from the existing ground level (thus eliminating the need to excavate into the rooting area) and allows the spreading of load (reducing compaction which can adversely effect, damage or kill roots). This system can be topped with a finish to suit the design (gravel, porous tarmac, paving, etc.) but, the finish should remain porous, to allow for water and gaseous exchange into the soil and roots below. Cellweb has been specified to minimise impact in locations where the project intersects with the RPAs of retained trees. The final proposed system must be reviewed and agreed by the project Arboriculturist before works commence.

### 6.5.4 Excavation within RPAs

Excavations will be required within the RPA of Trees 8, 9, 14, 15 and 2 to facilitate the proposed work (refer to Appendix **Error! Reference source not found.** for the Tree Protection Plan). As a result, the works must be undertaken in accordance with the following:

- Remove RPA ground protection measures to the edge of the excavation area as detailed by the project design shown in the Tree Protection Plan (please refer to the 100120806-MM-ZZ-EGRP-EN-0007- Arboriculture Report). Ground protection measures beyond this agreed area must remain in situ;
- The initial excavation within the RPA must be carried out under arboriculture supervision using hand tools to depth of 600mm to minimise severance of tree roots or direct damage to the protective bark of tree roots. It may be possible in some instances to use specialised equipment such as high air pressure machinery to excavate the soil with minimal disturbance to roots. Should no roots be identified within the first 600mm depth, machine digging will then be acceptable;
- If roots are identified, those with a diameter less than 25mm may be pruned back, preferably to a growing point. A sharp cutting tool such as bypass secateurs or a handsaw should be used to leave the smallest wound possible;
- Roots greater than 25mm in diameter and large bundles of roots less than 25mm in diameter should be retained wherever possible, if they are to be pruned this must be under supervision of the Arboriculturist. Exposed roots over 25mm diameter which are to be retained must be wrapped in dry, clean Hessian sacking to prevent desiccation and to

protect from rapid temperature changes. In warmer weather, the sacking should be kept moist by regular watering. Sacking should be removed before backfilling;

- Root pruning should be carried out under the supervision of the project Arboriculturist to ensure that only roots necessary to facilitate the development will be removed to limit the impact on the retained trees;
- If roots are identified, backfilling of any excavation should be carried out by hand to avoid direct root damage by excessive compaction and should include, where possible, the replacement of inert granular material mixed with sharp sand (not builder's sand) around retained roots. This fill should be gently firmed but must not be compacted. Backfilling should be undertaken as soon as possible;
- Soil levels around the base of retained trees are to be maintained as existing;
- During the pouring of concrete foundations any remaining exposed roots must be protected from concrete to mitigate against chemical burns; and
- If during construction it is found that excavations are required beyond the project's design detailed within the Tree Protection Plan (**Error! Reference source not found.**), the project Arboriculturist must be contacted for further instruction.

### 6.5.5 Supervision and inspection

Arboricultural supervision is recommended during any works within the RPA of retained trees on site and during the realignment of barriers when access to an RPA is required. It should be noted that even with supervised works, retention of all trees on site is not guaranteed.

On completion of the project, an Arboriculturist must look for signs of intolerance to the change in conditions, the effect of the project and any accidental damage to retained trees, to identify the need for further tree works in addition to those originally specified at the outset of the project.

### 6.5.6 Sequence of activities

To ensure adequate protection for the trees, the following order of activities should be followed:

- Any design amendments to the location and dimensions should be reviewed by the project;
- The Environmental Manager must be provided with a copy of the Arboricultural Report and the Tree Protection Plan prior to the commencement of any site clearance or construction works;
- Undertake tree works (as appropriate, and subject to such consents as may be appropriate);
- Inform the project Arboriculturist of the date that temporary protective barriers and ground protection are to be installed;
- Erect tree protective barriers and install ground protection in accordance with this report and directions given by the project Arboriculturist on site;
- Brief all site operatives, visitors, and Sub-Contractors on the presence of tree protective barriers and ground protection, and the need to ensure that all operations remain wholly outside the protected areas as part of site induction procedures; and
- Remove temporary protective barriers and ground protection once all site operations have ceased.

## 6.6 Noise and vibration

Construction activities could result in potential noise and vibration impacts on the sensitive receptors, however the adoption of construction best practice measures will reduce potential effects.

Noise Control (operational plant and machinery) will meet the noise levels specified in the planning conditions, the post construction operational limit will be 40dB LAeq (daytime) and 30dB LAdB (nighttime). The rating level of the noise emitted from fixed plant and equipment (mechanical and electrical) located at the site to be in line with statutory requirements.

Standard best practice for mitigation of noise and vibration should include the following:

- Minimise the use of generators where practicable, such as through connection to the mains electricity. However, generators will be required during several activities including site setup. Care must be taken to locate generators to minimise noise impacts where practicable including consideration of location with respect to screening features, orientation and distance to nearest receptors;
- Plan hours of working to account for nearby sensitive receptors and the duration of works. Adhere to the working hours stated in Section 5.3.1;
- Control of noise at source; use of enclosures for significant noise sources, suitable selection of plant, avoid revving engines and switch off equipment when not in use, keep haul roads well maintained, minimise drop height of materials, regular and effective maintenance of plant and machinery;
- Minimise reversing, and therefore the sounding of audible reversing alarms, at all times;
- Carefully site/orientate plant, including where reasonably practical positioning of generators, pumps and stationary plant items within the compound or at works locations such to maximise distance between noise sources and receptors and provide acoustic screening from intervening structures;
- Shut down or throttle down vehicles and plant to a minimum in the intervening periods between work; and
- Reduce vibration impacts due to breaking out of haul roads and hardstanding when in proximity to sensitive receptors by utilising saws with a circular saw to sever any structural continuity and minimise propagation of vibration to adjacent receptors.

## 6.7 Land quality and human health

The following mitigation measures in relation to land quality and human health should be adopted for the project:

- All site workers must be adequately trained to recognise and appropriately respond to potential land quality issues. Training should also include the location of site welfare facilities and where appropriate, use of decontamination units;
- All site workers are to have the appropriate Personal Protective Equipment (PPE) (e.g., high visibility clothing, safety boots, hard hat, safety glasses, gloves). These are to be detailed within a Health and Safety Plan;
- The site will be well delineated and kept secure to prevent trespass by members of the public; and
- Robust environmental incident response procedures to be put in place (e.g., with respect to unexploded ordnance (UXO), previously unidentified contamination or structures), which are periodically tested and reviewed. In the event of previously unidentified conditions being encountered (e.g. underground storage tanks, chemical drums), works would be suspended, the works area evacuated, and specialist advice obtained. Where appropriate, risk assessments would be undertaken, and additional control measures implemented prior to any works recommencing.

## 6.8 Fuels, oils and chemical management

The following mitigations measures related to fuels, oil and chemical management should be applied across the site during construction.

### 6.8.1 Contamination prevention

- Fuel and other chemicals to be stored in designated areas with potentially contaminating substances stored on drip trays or in double skinned bunded tanks which hold 110% of the capacity of the chemicals stored. Arrangements need to be in place to deal with any rainwater ingress into the bund;
- Any fuel storage must be secure from theft;
- Spill kits to be readily available in appropriate locations to deal with spillages to ground;
- Any re-fuelling will be via a mobile bunded bowser equipped with a spill kit and bunding. No refuelling or fuel storage to take place within 10m of a watercourse or surface water drain and must be undertaken in daylight hours (or well illuminated so any spills can be dealt with appropriately);
- Potentially contaminated materials will be stored appropriately and removed from site as soon as practicable;
- Storage areas for surplus excavated materials that demonstrate visual or olfactory evidence of contamination will be stored in covered skips, or on a sheeted stockpile placed on hardstanding or impermeable sheeting pending its removal or treatment; and
- Implementation of good construction site control measures to reduce dust such as damping down and wheel washes.

### 6.8.2 Measures for Earthworks

- Excavations are to be inspected by the Principal Contractor, who will act as the watching brief, for signs of contaminated material;
- The following measures will be implemented as part of the discovery strategy:
  1. If any suspected contaminated material is uncovered, cease works within proximity of the contamination;
  2. Report to the Contractor's Environmental Manager;
  3. Seek advice from a specialist prior to further movement; and
  4. If contaminated material is suspected, excavating operations shall be ceased, and a written method statement providing details of remedial measures shall be produced, submitted to, and agreed by the LPA.

## 6.9 Water resources

The following sections describe the environmental control measures that will be put in place to prevent pollution of the water environment during construction. Best practice guidance will be followed to ensure controls are in place to avoid adverse effects.

Suitable protection for watercourses potentially affected by the works will be installed prior to relevant works proceeding. These measures will be in line with the Environment Agency's pollution prevention guidelines (PPGs).

### 6.9.1 Potential pollution sources

Potential pollution sources include:

- Dewatering activities and site runoff;

- Ground conditions;
- Dust suppression and vehicle wash;
- Welfare facilities;
- Concrete manufacture (if applicable); and
- Oil and chemical storage.

### 6.9.2 General pollution prevention measures

The following key standard best practice and mitigation measures include:

- There will be no uncontrolled run-off of water and mud from the site. Site drainage will be designed as a sustainable drainage system (SuDS) and installed ahead of the main construction works and include provisions for clean water drainage, and contaminated water containment;
- During works, plant and machinery will be refuelled and maintained within the designated refuelling area designed to contain spills and leaks. Drip trays will be used;
- Fuel, oils and chemicals will be stored in a secure area that meets Control of Substances Hazardous to Health (COSHH) regulations requirements;
- Diesel fuel will be stored in a bunded diesel bowser which will be located within a fenced off area in the construction compound and located at least 10m away from any watercourse and land drains. The secondary containment requirement of at least 110% of a tank's maximum capacity will be applied to onsite storage of bulk fuel and oils;
- Plant and equipment will be regularly maintained to reduce the risk of fuel leaks and the resultant hydrocarbon contamination;
- Spill kits will be readily available to all personnel. The spill kits will be of an appropriate size and type for the materials held on site. Other emergency provisions will be as per the site Emergency Response Plan prepared by the Principal Contractor prior to construction;
- The storage and activities involving the use of materials, chemicals and oils shall be inspected daily to ensure all relevant controls are in place and effective in preventing pollution of the water environment;
- All fuel, oil and chemical deliveries will be supervised by a refuelling marshal who will be trained to deal with any spillage to prevent a pollution problem occurring;
- On site water attenuation provisions may be required to reduce the silt content of the site water runoff and any dewatering activities, prior to discharging the treated effluent to surface water or the sewer;
- Effluent from the site welfare facilities will be collected in an effluent holding tank and removed from site as controlled waste. The foul effluent can only be removed from site by licensed waste disposal companies and the effluent must be taken to a fully recognised and licensed sewerage treatment works;
- If on site concrete batching is required, the following measures will be implemented to prevent discharges of cementitious materials and alkaline wastewaters to the surface water drainage system, subsoil and groundwater:
  - Concrete washout will not drain to any waterbody, drainage channel. Impermeable areas will be designated for concrete handling/mixing and for washing and cleaning, at least 10m from surface drainage system, local land drains and waterbodies.
  - There will be a designated area for the washout of concrete wagons, shoots and mortar bins at the site. This will be either a lined skip or a pit lined with an impervious membrane to prevent the escape of the alkaline and silty waters entering the groundwater or surface water; and

- Excess concrete remaining in the delivery wagon at the end of a pour will be returned to a designated collection area. Once work sites are completed any solid concrete in the washout area will be broken out and used either as suitable fill or disposed of to a licensed waste facility.
- Groundwater monitoring will take place during construction works and for a short while after completion of construction works.

## 6.10 Traffic and Transport

The following best practice mitigation measures should be applied to minimise the effects of construction traffic on the highway network as far as possible:

- Deliveries will be made within the agreed working hours to ensure access to the site is available and no queuing on the road;
- Where possible, heavy and special loads will be delivered to the site during off peak hours and subject to agreement with LPA;
- Obstruction of the highway by the reversing or parking of construction vehicles onto the public highways should not be permitted, and all construction workers and visitors will adhere to this;
- Materials and equipment will be stored on site to minimise unnecessary traffic movements;
- Where possible the site operatives will be encouraged to use public transport or use car sharing;
- If required, vehicle access will be controlled using an appropriate traffic marshalling (gateman/banksman) responsible for managing vehicle movements in and around the site; and
- All site accesses will be robust level hard-standings, to be kept clean, well signed and controlled. Entry gates will be closed at all times when access is not required. Appropriate signage will be fixed to the gate(s).

## 7 Monitoring and evaluation

### 7.1 Inspections

Weekly inspections of both on and off site areas are to be carried out by the Construction Site Manager to ensure the management procedures in this CEMP are in place. This weekly inspection is also to include a check for training records that have taken place that week.

As part of their role the Environmental Manager or Contractor's Construction Manager will conduct joint inspections with the NHS Trust and other stakeholders, such as the Environment Agency and Mid Sussex District Council, as requested.

### 7.2 Complaints and mitigating impacts

The Contractor's Environmental Manager will be responsible for dealing with any queries and/or grievances in relation to the effects of noise generated at the site, including a responsibility for recording all queries/complaints, investigating the issues raised and ensuring that appropriate action is undertaken, including responding to the complaint in an appropriate and timely manner. A record of all complaints made using the Contractor's system ININDEX to capture all environmental complaints, and the actions taken will be maintained.

### 7.3 Internal audits

The Contractor's Environmental Manager will conduct environmental audits to examine environmental mitigation measures and performance standards at the earliest opportunity. The first audits should be carried out about 1-2 weeks after works have commenced on site.

Compliance with the conditions of environmental consents and licences will be assessed during site inspections and audits.

Internal audits will continue on a quarterly basis for the full duration of the construction programme.

### 7.4 Non-conformity and corrective actions

Any non-conformances or corrective actions shall be identified through near miss environmental reporting, environmental incident reporting, environmental inspections, and audits.

All non-conformances and corrective actions will be recorded within the EMS. Any required actions shall be appropriate to the scale of the anticipated or actual environmental impact. It will be the responsibility of the Contractor's Environmental Manager to ensure that the required corrective actions are implemented and reported to the Project Manager.

As a minimum the non-conformity reporting approach should be able to:

- Identify the root cause of the issue;
- Identify appropriate mitigating actions/ procedures;
- Identify preventative actions against any recurrences; and
- Assign responsibility for implementing the corrective action and timeframe in which it should be closed out.

The Project Manager and Contractor's Site Manager reserves the right to remove from site immediately any person whose acts or omissions in their opinion constitutes a danger to people, environment, or property. Any person who does not comply with environmental rules and arrangements detailed in this CEMP will in the first instance receive a written warning from the

nominated person and any subsequent misdemeanours will provoke the removal of the person from site.

## 7.5 Close out report

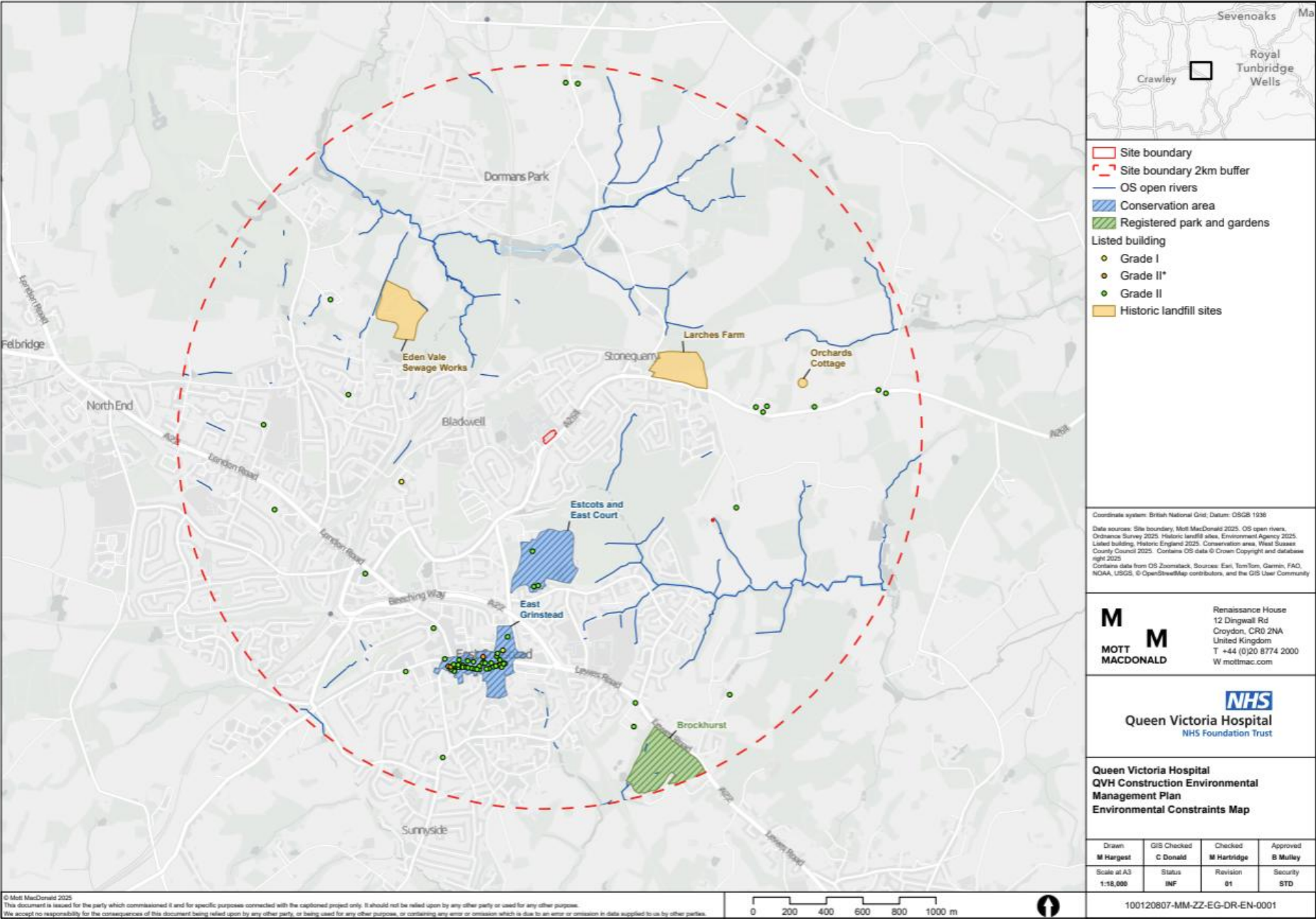
Any corrective actions recorded must be closed out within the given timeframe. Those items not closed out completely shall be carried forward to the next inspection until they are closed out. If the deficiency persists or is a serious breach, then the Contractor's Project Manager will take further actions to ensure that the matter is closed out.

## A.1 Legislation and policy

| Policy                                    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>European Directives</b>                | <p>By virtue of the Waste (England and Wales) Regulations 2011 when determining any application for planning permission that relates to waste management (article 18) the planning authority is required to take into account of the EU Waste Framework Directive (EU Council Directive 2008/98/EC) which sets out the objectives of the protection of human health and the environment (article 13) and self-sufficiency and proximity (first paragraph of article 16(1), article 16(2) and (3)). Case law has confirmed that these articles are objectives at which to aim. As objectives, they must be kept in mind whilst assessing the application and provided this is done, any decision in which the furtherance of the objectives are not achieved, may stand.</p> <p>A number of other European waste directives also form an important context for waste planning applications. The Landfill Directive (Directive 1999/31/EC) aims to reduce the amount of waste going to landfill and provides information on the management of different types of waste. The Directive on the Incineration of Waste (EU Council directive 2000/76/EC) aims to prevent the negative effects on the environment caused by the incineration of waste.</p> <p>The Water Framework Directive, the Environmental Noise Directive, and Air Quality Directive cover the protection of waters, amenity, and air quality respectively.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>National Planning Policy Framework</b> | <p>The National Planning Policy Framework (NPPF) was first published on 27 March 2012 and has subsequently been amended numerous times, most recently in February 2025. It sets out the overarching policy for planning and planning related decision-making in England. Planning law requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. The key chapters of relevance to this planning application are as follows:</p> <ul style="list-style-type: none"> <li>• Chapter 2: Achieving Sustainable Development;</li> <li>• Chapter 4: Decision Making;</li> <li>• Chapter 8: Promoting Healthy and Safe Communities;</li> <li>• Chapter 9: Promoting Sustainable Transport;</li> <li>• Chapter 12: Achieving Well Designed Places;</li> <li>• Chapter 15: Conserving and Enhancing the Natural Environment; and</li> <li>• Chapter 16: Conserving and Enhancing the Historic Environment.</li> </ul> <p>Paragraph 101 of the current iteration of the National Planning Policy Framework (published March 2012) states: To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.</p> <p>The NPPF makes clear its intention to support infrastructure that supports and promotes health among local communities, including healthcare facilities such as the delivery of the proposed CDC at QVH.</p> |
| <b>Mid-Sussex District Plan 2014-2031</b> | <p>The District Plan includes the strategy, proposed level of development and a number of planning policies.</p> <p>The policies within the Local Plan that are relevant to the proposed development at QVH are listed below.</p> <ul style="list-style-type: none"> <li>• Policy DP1: Sustainable Economic Development;</li> <li>• Policy DP2: Town Centre Development;</li> <li>• Policy DP3: Village and Neighbourhood Centre Development;</li> <li>• Policy DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC);</li> <li>• Policy DP20: Securing Infrastructure;</li> <li>• Policy DP21: Transport;</li> <li>• Policy DP25: Community Facilities and Local Services;</li> <li>• Policy DP26: Character and Design;</li> <li>• Policy DP28: Accessibility;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Policy                                                  | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                         | <ul style="list-style-type: none"> <li>• Policy DP29: Noise, Air and Light Pollution;</li> <li>• Policy DP34: Listed Buildings and Other Heritage Assets;</li> <li>• Policy DP37: Trees, Woodland and Hedgerows;</li> <li>• Policy DP38: Biodiversity;</li> <li>• Policy DP39: Sustainable Design and Construction; and</li> <li>• Policy DP41: Flood Risk and Drainage</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>East Grinstead<br/>Neighbourhood Plan<br/>(2016)</b> | <p>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. The application site falls within the neighbourhood plan area for East Grinstead which sets out local neighbourhood planning priorities and policies for the East Grinstead area within Mid Sussex and forms a material planning consideration in the decision-making process. The policies listed below are considered relevant to the project.</p> <ul style="list-style-type: none"> <li>• Policy EG3: Promoting Good Design;</li> <li>• Policy EG4: Heritage Assets;</li> <li>• Policy EG10: Employment Provision;</li> <li>• Policy EG11: Mitigating Highway Impacts;</li> <li>• Policy EG12: Car Parking;</li> <li>• Policy EG13: Embracing Modern Technology;</li> <li>• Policy EG14: Protection of Open Space; and</li> <li>• Policy SS6: Queen Victoria Hospital.</li> </ul> <p>Policy EG3 promotes good design in East Grinstead, the design of the CDC has been sensitively developed in line with the existing context. Policy EG4 protects both designated and non-designated heritage assets, the project has been designed to minimise its impact on the Jubilee Building and views of the building from the street. Policy SS6 (Queen Victoria Hospital) supports the continued use of the land for healthcare uses. The proposed site is within this policy allocation; therefore, the project is in line with this policy. SS6 also requires that development is below 4-storeys to promote the character of the Cottage Hospital and tower. The proposed CDC is a single storey building that utilises brickwork as the main external material to complement the Jubilee building. The Policy also advocates for sensitive design that conserves and complements the historic and architecturally significant elements of the hospital; the scale of the new building and materials selected have been carefully designed to accord with this policy.</p> |

## A.2 Environmental Constraints Map



### A.3 Tree Protection Plan

