

East Anglia THREE Outline Offshore Construction Environmental Management Plan

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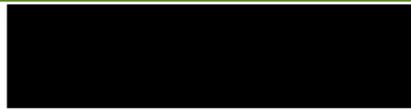
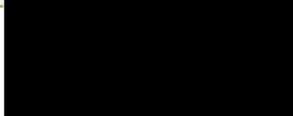


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Offshore Outline Construction Environmental Management Plan

Appendix for Environmental Statements
UKEN-IGE-SPR0012, Rev 0, September 2015

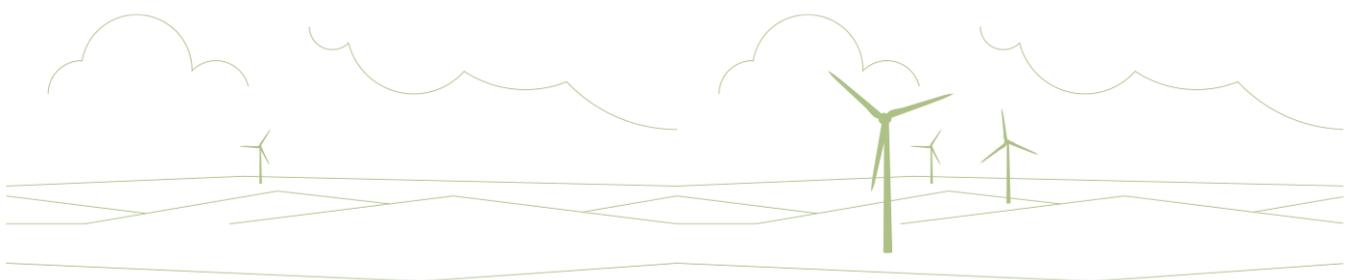
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Introduction

1. There are potential environmental sensitivities associated with an offshore wind farm development, which need to be identified and considered before construction of the project and its associated infrastructure takes place.
2. These potential effects are outlined in the project Environmental Statement (ES), including embedded mitigation in the form of good practice that will require to be adhered to during the construction phase as a minimum standard. A description of the proposed development is generally outlined in a 'Project Description' chapter of the ES.
3. ScottishPower Renewables recognises from feedback during the Environmental Impact Assessment (EIA) consultation and stakeholder engagement process, that the provision of an Outline Construction Environmental Management Plan (CEMP) as part of the ES adds value to the ES, to demonstrate the linkages between the ES, site activities, and likely conditions associated with any development consent.
4. The main purpose of this document is therefore to set out the typical framework of a CEMP, including the controls that are proposed to be adopted to manage the environmental risks associated with the construction of SPR offshore windfarm projects. The document is based on SPR's minimum requirements, industry good practice and relevant legislation (at the time of preparation).
5. This document is for both internal and external use (the latter via inclusion in Environmental Statements and Planning Submissions).

1 Scope

1. A CEMP sets out the controls and processes that are to be adopted to mitigate environmental impacts throughout the construction phase of a project and measures set out to comply with consent conditions. The CEMP is considered to be an iterative document that develops throughout the construction phase of a project.
2. Contractors will be responsible for the construction of the main infrastructure associated with the wind farm projects, including met masts, turbine foundations, turbine erection, cable laying and substations. These may be managed as individual projects or as a framework.
3. Preparation of a project CEMP will be the responsibility of the appointed Principal Contractor for the project that they have been awarded. The Principal Contractor is likely to have internal management system requirements and CEMP templates, so the actual project CEMP may vary from what is set out within this document
4. In relation to any offshore works, a Project Environmental Management Plan (PEMP) is a typical requirement under a Marine Licence.
5. This outline CEMP will also form the basis of the PEMP.
6. Requirements within the PEMP will be communicated to Contractors, where relevant, to discharge the relevant licence condition and to communicate project environmental requirements and standards to facilitate incorporation into their CEMP.
7. The PEMP shall be the responsibility of the Project Manager to manage in close working with the Contractors.
8. It should be noted that a Code of Construction Practice (CoCP), which includes environmental management requirements, will also be developed for the onshore elements of UK projects, where required and will be subject to agreement with relevant Local Planning Authorities.

9. Additional information with regard to SPR environmental management requirements and project specific requirements are set out in SPR infrastructure contract documents (including the Environmental Statement (and therefore this Document), development planning conditions and the Company's Environmental Policy.
10. Compliance with SPR environmental management requirements will be audited as part of the SPR annual environmental audit programme.

2 Typical content for a CEMP

1. Typical Contents for an offshore project CEMP are set out below; these will be different depending upon whether the CEMP is for onshore or marine activities. Outline content for each section is described in Sections 3 to 12.
 1. Project Description and Environmental Sensitivities
 2. Environmental Management Structure and Responsibilities
 3. Associated Documentation
 4. Management of Key Environmental Issues
 5. Monitoring and Site Inspections
 6. Legislative and Regulatory Compliance
 7. Training and Awareness
 8. Communication and Reporting
 9. Subcontractor Management
 10. Sustainable Construction

3 Project Description and Environmental Sensitivities

1. This section should set out information or links to information with regards to the project and environmental sensitivities. In particular, sensitive ecological, archaeological or human receptors, such as protected habitats, protected wrecks, habitations, constraints, site layout plans, and the scope of works to be undertaken, including identification of environmental aspects and impacts, should be considered.
2. The Principal Contractor for each construction project will be expected to have their own Aspect and Impacts Register as part of their Environmental Management System.

4 Environmental Management Structure and Responsibilities

1. Environmental Management roles and responsibilities for the project require to be documented. This section should set out the environmental responsibilities for the project, including identification of key site staff, their environmental management responsibilities and how these link with other members of the project team, such as the Project Manager, the Project Health Safety / Environmental Manager (s) and / or Advisors and environmental specialists such as Environmental Liaison Officer, Fisheries Liaison Officer, Ornithologists, Marine Mammal Observers or Archaeologist.
2. Interactions with stakeholders such as the Local Authority, Natural England, Environment Agency, Marine Management Organisation, etc should also be covered in this section.

3. An organisational chart depicting the environmental management arrangements is often a useful mechanism to illustrate the project environmental management structure. The contact details for the individuals listed should also be included in this section or attached as an appendix to the CEMP.
4. On the majority of construction projects, SPR will employ a Principal Contractor who will be responsible for environmental management on site, including the preparation of onsite environmental documentation.

5 Associated Documentation

1. This section should refer to relevant associated Environmental Management System (EMS) and project/site specific documentation that requires to be taken into consideration in developing the CEMP. Examples include, but are not limited to:
 - Contract requirements (such as environmental standards)
 - Contractor's EMS requirements
 - Project Emergency Response Plan
 - Project Health and Safety Plan
 - Project Environmental Statement
 - Development Order Consent conditions
 - Marine Licence conditions
 - Risk registers and
 - Legal registers.

6 Management of Key Environmental Issues

1. This section should set out details of the controls and procedures to be adopted to mitigate the environmental impacts associated with the development.
2. Typically this would cover the following issues.
 - Noise and vibration
 - Marine and terrestrial ecology
 - Marine and terrestrial archaeology and cultural heritage
 - Dropped object in the marine environment
 - Wastewater discharges
 - Seabed impacts
 - Oils, fuel and chemicals
 - Waste management
 - Traffic, transport and vessel management
 - Surface water management
 - Water abstraction
 - Landscaping strategy
 - Emissions to air; and
 - Method Statements and Risk Assessments
3. It is recognised that some of the issues identified above, relate only to the marine environment or the terrestrial environment, whilst the majority will apply to both onshore and offshore construction activities.

4. A brief overview of some of the key issues for each item is provided below. However, it must be noted that the list of issues identified above is not exhaustive and will be site / project specific.

6.1 Noise and Vibration

6. There is the potential for noise and vibration to be generated during the construction process, especially from heavy plant and machinery. Measures will require to be implemented on site to minimise any effects and a programme of monitoring may be required.
7. The project ES will identify receptors that are potentially sensitive to noise and vibration impacts together with mitigation measures, which must be implemented.
8. For offshore construction projects involving piling and foundation works in the marine environment, it is likely that a specific noise and vibration mitigation and monitoring plan to mitigate potential impacts on marine mammals/fish will be required. In addition a specific Marine Mammal Mitigation Protocol will be prepared and agreed with the regulator, where required.
9. In addition, an Environmental / Ecological Monitoring Plan will be prepared, as required, setting out requirements and responsibilities; this may include noise and vibration monitoring.
10. For works occurring onshore, standard noise and vibration mitigation techniques will require to be considered, such as specified working times and use of low noise emitting plant and equipment.

6.2 Marine and terrestrial ecology

11. Monitoring of flora and fauna should be undertaken as part of the Environmental / Ecological Monitoring Plan by the appropriate personnel. Monitoring details should be recorded in the form of a monthly report; the report should be issued to the Project Team , with findings of the report being discussed at periodic health, safety and environmental meetings (Section 10 below refers).
12. For offshore construction, it is likely that a risk assessment for European Protected Species (cetaceans) will require to be incorporated into the CEMP. For onshore, a European Protected Species Protection/Mitigation Scheme may be incorporated into the Ecological Management or Monitoring Plan.
13. Depending on the location of the site, Consents/Licenses may also be required in relation to Protected Species and Habitats (The Conservation of Habitats and Species Regulations 2010; Wildlife and Countryside Act 1981), Protection of Badger Act, 1972 and Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007, (as amended).
14. The project ES will identify areas of conservation / protection and set out mitigation as appropriate. The CEMP should include the measures to be adopted. This will enable communication of awareness of any sensitive areas and potential protected features (eg. reefs) to the project team. The procedures to be adopted in the event of an incident in proximity to these features should also be set out in the CEMP.
15. The Environmental Monitoring Plan will also set out requirements for monitoring benthic habitats as appropriate.
16. The Principal Contractor's CEMP will require to consider, and make mitigation provisions for, potential seabed and sediment movement impacts.

6.3 Marine and terrestrial archaeology

17. The project ES will identify sites / wrecks etc of potential archaeological importance and these should be identified in the Written Scheme of Investigation (WSI) with appropriate mitigation, such as establishment of exclusion and buffer zones clearly marked out. The CEMP should include the measures to be adopted to communicate awareness of sensitive archaeological sites to the project team and the procedures to be adopted in the event of an unanticipated find.
18. The Project Archaeological Written Scheme of Investigation will require to be referenced in the CEMP.

6.4 Dropped Object in the marine Environment

19. A Dropped Objects into the marine environment plan or similar should feature as a component of the Contractor's CEMP. This may be a specific Deemed Marine Licence requirement.
20. This procedure should detail the proposed recovery for both floating and non-floating objects and the reporting and documenting of the incident to the Project Team and the regulator. The procedure requires to be reviewed by the Project Team prior to the contractor commencing work.

6.5 Wastewater discharges

21. For onshore construction projects, the Principal Contractor is responsible for obtaining from the Regulator, in advance of discharge, any permits associated with the use of septic tanks or other effluent / washout water treatment facilities. In addition they will be responsible for monitoring and recording specified volumetric, quality or reference conditions, to demonstrate compliance.
22. Waste sludge from septic tanks and effluents from cesspits and sewage holding tanks must be removed by a suitably licensed and registered waste carrier in accordance with Duty of Care requirements.
23. For offshore construction projects, any wastewater discharges to sea must comply with current legislation, regulatory limits and Good practice such as effluent discharges, ballast waters, bilge waters, and deck runoff. Controls for discharges should be included in the CEMP.
24. Monitoring records in relation with the disposal of foul water, bilge water or ballast water during the construction phase must be retained.

6.6 Oils, fuels and chemicals

25. It is the responsibility of each contractor to have in place adequate controls for the delivery, storage and use of fuels, oils and chemicals on site and on vessels and other materials as required. This includes checks that chemicals to be used offshore comply with relevant regulations.
26. Within their environmental management plan, each contractor must consider the delivery, storage and handling of hazardous materials and in particular oils and fuels taking into account the legal requirements and good practice guidelines.
27. Oils and chemicals must be clearly labelled and each contractor should retain an up-to-date hazardous substance register. Activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling, should have detailed method statements in place and be undertaken by designated and trained personnel.
28. Oil and fuel storage tanks must be robust and provide adequate secondary containment and be located in designated areas taking into account security, the location of sensitive receptors and pathways such as drains and watercourses, and safe access and egress for plant and manual handling.
29. Spill response materials should be provided nearby and be readily accessible, with local project personnel trained in spill response.
30. Vessels of more than 400 gross tonnage should maintain an oil record book and the sulphur content of fuels must comply with MARPOL Annex VI requirements in relation to Sulphur Emission Control Areas (SECAs) and hold a valid International Oil Pollution Prevention Certificate (IOPP).
31. Within the port, fuel and chemical management will be developed following discussions with the port authority and will require to be documented in the CEMP.

6.7 Waste management

32. Where waste is produced, reuse, recycle or recovery should be considered where practical and economically feasible prior to considering disposal.

33. Each contractor is responsible for the collection, storage and disposal of any waste produced as part of the Works and will require to prepare a Waste Management Plan in line with legislation and Good practice. The Plan should record the following information, as a minimum:

- The types and quantities of waste generated;
- The management approach for each waste type (Reuse, Recycle, Recover, Dispose) including any treatment;
- The storage arrangements for each waste type; and
- The site waste monitoring and reporting arrangements.

34. Duty of care requirements in relation to the storage, transfer and disposal of waste must be complied with.

35. The waste management principles outlined above, also apply to vessels, in particular the requirement to have a compliant Garbage Management Plan and Garbage Record Book; vessel operators are required to liaise with port operators to facilitate appropriate segregation/disposal of waste.

6.8 Vessel and Traffic Management

36. During the construction phase for onshore aspects of the development, there will be traffic movements within the site boundary in addition to associated traffic movements on the local road network, including heavy goods vehicles. Measures to address associated impacts should be set out in the CEMP and may include a traffic management plan, incorporating an Access Management Scheme (highway improvements), a Travel Plan and Construction Traffic details; these will be agreed with the relevant stakeholder.

37. For offshore construction, it is likely that a specific Project Vessel Coordination Plan will be developed. Vessels will be subject to inspections and audits as described in Section 8 below. Vessel movements within the site will be monitored and directed as required by the Marine Coordinator.

6.9 Surface water management

38. For onshore construction sites, the CEMP should include a detailed surface water management design / drainage plan for the site. The plan should detail the surface water management measures to be implemented during the works. The detailed design should be supported by the rationale for selecting the chosen mitigation measures, together with associated calculations and methodologies for sizing. Where appropriate, the principles of Sustainable Urban Drainage Schemes (SUDS) should be applied.

39. Mitigation measures must be maintained and monitored on a regular basis. A record of inspections of mitigation measures and any required maintenance carried out by the Contractor must be maintained.

6.10 Water abstraction

40. For onshore construction sites, abstraction of water may be required for potable supply or for use during site activities, such as concrete batching or washing. The Contractor is responsible for obtaining from the Regulator (such as Environment Agency), in advance of use, any permits for the use of abstracted water during the construction related activities and for monitoring and recording associated abstraction rates or other license requirements to demonstrate compliance.

6.11 Emissions to air

41. For onshore construction sites, the CEMP will need to consider the potential for dust nuisance to arise, and detail appropriate mitigation measures.

42. For offshore construction and operations, vessel emissions must comply with MARPOL Annex VI requirements in relation to ozone depleting substances regulations, nitrogen oxide, sulphur oxide and particulate and volatile organic compounds. Where relevant, vessels shall have a valid International Air Pollution Prevention (IAPP) certificate.

6.12 Method Statement and Risk Assessments

43. It is the responsibility of the Contractors to have in place approved method statements and risk assessments for works being carried out on-site. Where relevant, the method statement should cross reference applicable environmental risk assessments. The risk assessments should identify environmental hazards and outline subsequent control measures. Control measures should be developed, implemented and monitored to ensure that any impact on the environment is avoided or minimised. Approval for these method statements with the relevant authorities may be required.

44. Key personnel involved in the work activities should be given a method statement briefing by the Contractor, in the form of a tool box talk (TBT). The TBT should outline the risks involved and the control measures that personnel are expected to comply with. It is expected that individuals sign a method statement attendance briefing record sheet, acknowledging receipt of the information; these records should be maintained by the Contractor. TBT's should also be used to inform contractors of other environmental sensitivities as appropriate.

7 Environmental incident response and contingency

1. It is essential that any environmental incidents (including dropped objects into the marine environment) are reported and managed correctly to allow their impact to be reduced to a minimum and to decrease the risk of the incident re-occurring.

7.1 Emergency Response Plan.

2. Contractors will require to have an environmental emergency response plan. The plan should include a response flow chart and detail how to report and respond to an environmental incident, including the measures available to contain/clean up an incident (e.g. local spill kits, waste reception facilities), manage dropped objects in the marine environment and offsite emergency response resources.
3. For the offshore activities, a Marine Pollution Contingency Plan (MPCP), which should form an integral component of the CEMP, will also require to be developed for the Project.
4. Vessels working on behalf of the Project will require to have a Shipboard Oil Pollution Emergency Response Plan (SOPEP) in accordance with IMO and MCA guidelines or an Oil Pollution Plan if under 400GT.

7.2 Reporting

5. All environmental incidents (including dropped objects into the marine environment) and near misses must be reported, investigated and recorded to the Project Team.
6. Contractors are required to produce monthly reports for the Project Team to record health, safety and environment performance

7.3 Lessons learned / Incident follow-up

7. If an environmental incident should occur, it shall be thoroughly investigated by the relevant contractor to establish the root cause and prevent any recurrence. Dependent on the severity of the incident, the Project Team may wish to manage or assist with the investigation process.

8 Monitoring and Site Inspections

1. A programme of performance and compliance monitoring shall require to be established for the site, this should be documented in the CEMP and include, but not necessarily be restricted to, the following items, where relevant.

8.1 Site inspections

2. The Contractor, or appointed delegate should undertake site inspections, on at least a weekly basis. These site inspections should include an environmental component which should, as a minimum and where relevant, cover waste management, surface water management, management of hazardous materials, water abstractions, wastewater management; emergency response, incidents and complaints, nuisance, and other site sensitive specific issues. Weekly inspections should be complimented by a combination of daily/monthly inspections, dependant on site-specific requirements.
3. The Contractor is responsible for ensuring the close out of any actions identified during the inspections. Records of the inspections carried out should be retained onsite by the Contractor; any remedial actions required must also be recorded.

8.2 Environmental audits

4. Environmental audits should comprise both internal audit and external audits .
5. The SPR audit programme includes a requirement to audit construction sites on a periodic basis. An audit checklist will be used by SPR to ensure that a standard approach is applied consistently. SPR environmental audits are carried out by experienced auditors, either from within the SPR environmental team, or via delegated specialists.
6. All actions raised from SPR audits are logged within a central system. Progress of audit actions is tracked and a closing date assigned when the action is complete.

8.3 Vessel inspections and audits

7. Environmental vessel inspections should be based on the International Marine Contractors Association (IMCA) standards, IMCA M 189/S 004 (Marine Inspection Check List for Small Boats) or IMCA M 149 (Common Marine Inspection Document). A log of all vessel audits and associated close out actions should be maintained. This is the approach adopted by SPR.

8.4 Environmental monitoring

8. A programme of physical monitoring such as for water quality, dust, noise, vibration, archaeology, transport, scour, and ecological surveys may be required, this will be incorporated into specific project plans such as the Code of Construction Practice for onshore works and CEMP for offshore.
9. Where appropriate, the scope of the monitoring required shall be agreed prior to construction with the appropriate authority.

9 Legislative and Regulatory Compliance

9.1 Development Consent Order conditions

1. UK Offshore sites are granted permission to be constructed under specific consents and licenses issued by Government bodies such as the Planning Inspectorate, Local Authority, Marine Management Organisation (MMO) and the Environment Agency.
2. Specific limits for emissions to air, discharges to land and water and working practices (such as seasonal exclusions) are contained within these consents/licenses and may not be breached at any time. The Development Consent Order and Deemed Marine Licence will be the key permissions to be adhered to for offshore projects.
3. The Principal Contractor must ensure that all relevant planning conditions for the project are complied with.
4. Planning conditions will be reviewed by the Project Team on a periodic basis, to ensure that the conditions are being complied with.

9.2 Legal Register

5. It is SPR policy to minimise the impact of its construction activities on the environment by complying with all relevant environmental legislation and Good practice. In order to ensure that SPR is aware of the requirements of current environmental legislation and Good practice an Environmental and Planning Legal Register is maintained by the SPR Environmental Team.
6. The Legal Register details relevant environmental legislation requirements for the business and also includes details of associated control measures.
7. The Contractor will be required to ensure that all relevant environmental legislation and Good practice are complied with on site. Adequate records of environmental information and audits to demonstrate compliance with both legal and Project environmental requirements, will require to be maintained by the Contractor.

8. The Contractor will be responsible for applying for and obtaining any related permits/licenses to their activities such as septic tank discharge permits, water abstraction licenses, activities associated with watercourse crossings, protected species licenses and other environmental consents or permits.
9. SPR will assess compliance with relevant environmental legislation as part of the SPR environmental audit programme.

9.3 Regulatory reference material

10. Key reference material in this section of the CEMP should include the following.
 - Register of relevant Planning Consent / Marine License / Permit Conditions;
 - Project Legal Register; and
 - Good Practice Guidance/Industry Standards such as Pollution Prevention Guidance Notes (PPG's). PPG Notes and other guidance documents are available from the Environment Agency and MMO web sites.

10 Training and Awareness

1. A range of mechanisms is used for training and raising awareness of project environmental issues; these include environmental inductions, Tool Box Talks, environmental notice boards, and environmental bulletins and alerts.

10.1 Project / site inductions

2. All site personnel will require to have a site induction that includes an environmental component. Designated on site personnel from the Contractor's project team should be responsible for preparing and delivering the site induction and maintaining documented attendee records.
3. It is expected that the environmental management contents of site inductions will include reference to compliance with relevant planning/license conditions, environmental management contacts, site specific environmental sensitivities, waste management arrangements, water and wastewater management, hazardous material management, fuel, oil and chemical management; environmental emergency response, reporting of incidents and complaints.

10.2 Tool Box Talks (TBT's)

4. TBT's are considered to be an effective method for the dissemination of information relating to work activities. Environmental TBT's require to be delivered by the Contractor to on-site personnel on an as required basis. It is the responsibility of the Contractor to ensure that all personnel attending the TBT have signed a TBT attendance sheet; TBT attendance sheets are likely to be inspected as part of environmental audits.

10.3 Environmental notice board

5. It is a SPR requirement that all our construction sites have an environmental notice board. The notice board must be displayed in an appropriate and prominent location and must be used to display copies of relevant environmental management information, including but not limited to the following;
 - Environmental Policies
 - Key Contacts Details, including Contractor's Environmental Management Representative
 - Environmental Bulletins
 - Site Location Plan showing ecologically / archaeologically sensitive areas, key management areas and location of contingency materials / features
 - Emergency Response Contact Details
 - Emergency Response Flowchart

10.4 Emergency response

6. The Contractor must ensure that all staff including any subcontractors are trained in the project environmental emergency response procedures, so that they are able and prepared to respond to an incident promptly and effectively on-site. Where appropriate, SPR encourages environmental emergency response plans to be tested on-site by the Principal Contractor.

11 Communication and Reporting

11.1 Meetings

1. Environmental meetings and debriefs will require to be held local to the site. Periodic health, safety and environment (HSE) meetings are required to be held on all SPR construction sites, including vessels and are likely to comprise representatives from the SPR project team, the Principal Contractor, and key sub-contractors. Minutes of meetings will be recorded and standard agenda items will include status of outstanding items, reports of environmental incidents or complaints, stakeholder engagement, TBT's issued / delivered, and key findings of environmental inspections and audits.
2. The Principal Contractor is expected to convene regular project team meetings to convey environmental information to the project team, including sub-contractors and to raise awareness of environmental issues.

11.2 Community Complaints

3. SPR values its relationship with the communities that surround our sites. All work shall be carefully planned to minimise disturbance to our neighbours.
4. Contractors must ensure that any complaints are reported to the Project Team and investigated promptly.
5. Within their environmental management plan, the contractor must have a procedure in place to report Public Complaints.

11.3 Community liaison and land use

6. Depending on the site location, a public/community relations plan may be developed for the site by the Principal Contractor. The purpose of the plan, which must be developed in liaison with the Project Team, should set out the approach to community liaison for the duration of the Project. For offshore aspects of the projects Fishery Liaison and Environment Liaison Officers will be appointed for the duration of the works, as required. For Onshore works an Ecological Clerk of Works will be appointed, as required.
7. Contractors must observe public rights of way and maintenance of flood defences where project activities may impact on these issues.

11.4 Stakeholders

8. Reference should also be made to any reporting requirements set out under the Development Consent Order and or Deemed Marine Licence.

12 Sub- Contractor Management

1. The Project / Site CEMP should set out how the Principal Contractor manages their subcontractor's onsite. This may range from the selection and assessment processes through to the assessment of performance on site.
2. For example, expectations of Contractors working on behalf of SPR are primarily detailed in this and the following documents:
 - Contract Schedules including specific environmental requirements
 - Environmental Policy
 - Environmental Statement

13 Sustainable Construction

1. During the design phase sustainable construction should be considered when planning out the construction phase of the Project.
2. For guidance, “Sustainable Construction”, is described by the Institute of Environmental Management and Assessment as
3. “application of sustainable development to the construction industry, whereby the construction and management of a development is based on principles of resource efficiency and the protection/enhancement of natural and built heritage. Sustainable construction comprises such matters as site planning and design, material selection, resource and energy use, recycling and waste minimisation”. (Institute of Environmental Management and Assessment, Environmental Management Plans Practitioner, Volume 12, December 2008).

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