

# Southampton to London Pipeline Project

## Deadline 6

Outline Construction Environment Management  
Plan (CEMP) (clean)

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## Acronyms and Abbreviations

Acronym	Definition
CEMP	Construction Environmental Management Plan
CEP	Community Engagement Plan
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
ECow	Environmental Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
LEMP	Landscape and Ecological Management Plan
SANG	Suitable Alternative Natural Greenspace
SDNPA	South Downs National Park Authority
SDW	South Downs Way
SEP	Suitably Experienced Person
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest



# **1 Introduction**

## **1.1 Overview**

- 1.1.1 Esso Petroleum Company, Limited (Esso) is making an application for development consent to replace 90km (56 miles) of an existing pipeline to transport aviation fuel between Boorley Green in Hampshire and the Esso West London Terminal storage facility in Hounslow. The replacement pipeline is 97km long taking into account that it cannot follow the line of the existing pipeline along its whole length due to new developments and environmental constraints.
- 1.1.2 Esso has already replaced 10km of pipeline between Hamble and Boorley Green in Hampshire. The replacement pipeline starts near Boorley Green at the end point of the previously replaced pipeline. The route runs generally in a northeast direction via Esso's Pumping Station in Alton. It terminates at the Esso West London Terminal storage facility. The areas of land to be permanently or temporarily used for the project are known as the Order Limits.
- 1.1.3 The project will be broken down into a number of stages. These will be based on geographical areas and could in some instances follow planning authority boundaries but would also consider the location of technically challenging sections of works such as a trenchless crossing beneath a major road or river, which may transcend planning boundaries.
- 1.1.4 Works to install and commission the pipeline are expected to start from grant of Development Consent Order (DCO) and be completed by early 2023. Certain advance works may take place prior to development consent where consented under alternative regimes, for example, the Town and Country Planning Act 1990.
- 1.1.5 The development authorised by the DCO must be undertaken in accordance with the Construction Environmental Management Plan (CEMP) pursuant to Requirement 6 of the DCO.

## **1.2 Purpose of the Construction Environmental Management Plan**

- 1.2.1 An Environmental Impact Assessment (EIA) was carried out to assess the effects that the project, as presented within the application for development consent, would have on the environment. As part of this process, which included extensive stakeholder engagement, a number of commitments to good practice measures to be actioned during design and construction were made. These were assumed as part of the assessment process. In addition, mitigation measures were proposed and committed to, to offset any significant effects identified as part of the assessment.
- 1.2.2 The purpose of the CEMP and its appendices is to set out how environmental management would be undertaken on the project during construction. The CEMP enables the environmental commitments made within the Environmental Statement (ES) to be actioned within the project.
- 1.2.3 The Outline CEMP has been produced to set out how the final CEMP would be structured and to provide clarity on what the final CEMP would contain. The final

CEMP will provide a consistent approach to the control of construction activities for the project. The CEMP and its associated appendices will outline site-specific measures and construction methodologies that will be required to be implemented to help reduce effects on the environment.

- 1.2.4 Under the terms of the DCO Requirement 6, no stage (as outlined in Section 1.1) of the authorised development must commence until a CEMP relating to that stage has been submitted to and approved by the relevant planning authority. Under Requirement 6 of the DCO, the final CEMP must be in accordance with the Outline CEMP.
- 1.2.5 Esso will put in place robust procedures to inform and supervise all those working on the project including its supply chain of contractors to make sure the control measures set out in the CEMP are adopted when undertaking the construction of the pipeline and ancillary works. The main responsibility for implementing these control measures will fall to Esso's principal contractor. The principal contractor will provide further detail of its plans and proposals as part of the submission of the final CEMP for approval.
- 1.2.6 The final CEMP will also contain a record of sensitive environmental features that have the potential to be affected by the construction of the authorised development. It will also outline how the commitments and actions would be tracked during construction.

### **1.3 Structure of the Construction Environmental Management Plan**

- 1.3.1 The Outline CEMP is an overarching document that contains several 'daughter' documents as appendices. These will contain more detailed information on particular topic areas. Outline versions of the supporting environmental plans are presented in the following appendices:
- Appendix A: Emergency Action Plan – sets out the emergency procedures to be put in place for potential environmental incidents.
  - Appendix B: Water Management Plan – sets out a framework for use and control of water on the project. It outlines the environmental risks and considers appropriate methods to mitigate against these risks. It considers surface water and groundwater pollution and surface water runoff contributing to flood risk.
  - Appendix C: Site Waste Management Plan – identifies the main sources of waste produced during construction of the project and how it should be disposed of.
  - Appendix D: Dust Management Plan – sets out how the project would avoid or reduce emissions to air and human exposure to emissions. It also promotes close working with relevant authorities to maintain air quality, and provides for mitigation where dust soiling cannot be prevented.
  - Appendix E: Noise and Vibration Management Plan – sets out measures to reduce noise and vibration impacts at local receptors during the construction of the pipeline. It also promotes positive working relationships with local communities and the relevant planning authorities.
  - Appendix F: Soil Management Plan – sets out the generic commitments that the project has made and details about how soils would be protected, stored and

reinstated as part of the works. It also outlines the monitoring and reporting that would be undertaken in respect of soils.

- Appendix G: Lighting Management Plan – sets out the project’s strategy for lighting including identification of light-sensitive locations and measures to reduce impacts for example at bat roosts.

1.3.2 The CEMP sits alongside a number of other project documents that should be read in conjunction with the CEMP when implementing the project. The links between the Outline CEMP and other documents are set out in Illustration 1.1 of the CoCP . The key documents include:

- Code of Construction Practice (CoCP): The CoCP provides a consistent approach to the control of construction activities along the entire pipeline and mitigate potential impacts on people and the environment. The CoCP is a certified document with compliance secured under Requirement 5 of the DCO.
- Outline Landscape and Ecological Management Plan (LEMP): This sets out the proposals in terms of landscape and ecology. The final LEMP will contain the reinstatement plans. The final LEMP would be approved by the relevant planning authorities in accordance with Requirement 12 of the DCO;
- Outline Construction Traffic Management Plan (CTMP): This sets out how the project will manage both construction traffic and impacts on the wider traffic network during construction. The final CTMP would be approved by the relevant highways authorities in accordance with Requirement 7 of the DCO; and
- Outline Community Engagement Plan (CEP): This sets out how the project will communicate with third parties during construction. It sets out the roles and responsibilities for engagement on the project and how complaints would be managed. The final CEP would be approved by the relevant planning authorities in accordance with Requirement 15 of the DCO.
- Site Specific Plans (SSPs): The SSPs provide location-specific construction methodologies. SSPs are certified documents with compliance secured under Requirement 17 of the DCO.

## **2 Design and Construction**

### **2.1 Project Commitments**

- 2.1.1 The project design is the result of a process of iterative design development that was introduced at project inception. Environmental considerations have had a key influence on the project, with knowledge gained through the EIA process, input from the project team (including the results of site surveys) and discussions with interested parties (such as land owners, local authorities and regulators). This has led to a number of commitments being included as part of the project, which are indicated by a code such as G123. These are secured through their inclusion in a variety of certified documents that form the basis of DCO requirements such as the CoCP, this Outline CEMP, the Outline CTMP, the Outline LEMP and other certified documents as appropriate to the content.
- 2.1.2 The project has also included measures for avoiding or reducing impacts to sensitive features, which have been built into the application for development consent. These include:
- Embedded design measures where specific commitments have been made to avoid or protect a feature. Many of these features were avoided through the final design of the Order Limits. Where the features still lie within the Order Limits and where an additional commitment has been made, these are set out and secured within Table 3.1 in the CoCP. For example, where an existing gap in a hedge could be used for the haul or access route.
  - Reduced working widths: This is where the working width is reduced within the Order Limits from the standard 36m width, to reduce impacts to sensitive environmental or community features including representation of the working methodologies applied to schools and sports pitches. The alignment could be anywhere within the Limits of Deviation and the Order Limits except where specified otherwise. The list of the locations of reduced width working can be found in Annex A in the CoCP.
  - Trenchless crossings: For most of the route, the pipeline would be installed using an Open Cut. However, in some locations along the route, it is intended to install the pipeline using trenchless techniques, such as auger bore or horizontal directional drilling (HDD). Although these techniques would generally take longer to install than Open Cut, they allow the project to reduce disturbance to sensitive features such as major watercourses, railway lines and major roads. The list of trenchless crossings can be found in Annex B of the CoCP and are also show on the General Arrangement Plans.

### **2.2 Construction Schedule**

- 2.2.1 Works to install and commission the pipeline are expected to start from grant of DCO, subject to relevant approvals, and be completed by early 2023. An outline schedule with key activities will be set out within the final CEMP. The following commitments regarding timing considerations will be incorporated as part of the development of the outline programme:



- G35: Bird Breeding Season: The assumption would be that vegetation with the potential to support bird nests would not be removed during the breeding bird season (March to August inclusive). If any works become necessary during the breeding bird season, works would be supervised by an Environmental Clerk of Works (ECoW). Appropriate protection measures would be put in place should active nests be found. These would include exclusion zones around active nests until chicks fledge or nests become inactive as determined by monitoring by the ECoW;
- G36: Mammal Breeding Seasons: An ECoW would supervise clearance of habitats that have high potential to support juvenile or pregnant brown hare (in February), hedgehog (in September) and harvest mouse (in September and October).
- G37: Hibernation Seasons: Habitat with the potential to support hibernating reptiles, amphibians, dormice and hedgehogs not to be removed between November and March without supervision by the ECoW, or unless previous mitigation has been implemented to exclude, remove, or encourage these animals from the works area (e.g. trapping and translocation of [great crested newt] GCN; habitat manipulation for dormice and reptiles).
- G38: Thames Basin Heaths [Special Protection Area] (SPA): Potentially disturbing construction works within the Thames Basin Heaths SPA would be undertaken in the four months between 1 October and 31 January unless otherwise agreed with Natural England. This would apply to the areas identified in Figures 9.9, 9.10 and 9.11 within the HRA ([APP-130](#) and [APP-131](#)).
- G171: Open cut crossings on five watercourses would be subject to constraints. The ditch leading to the tributary of the River Hamble (WCX006) would be subject to constraints between 1 October to 15 May. The tributary of the River Hamble (WCX007) would be subject to constraints from 1 October to 31 December and 15 March to 15 May providing a redd survey is undertaken downstream at the end of December or beginning of January and no redds are found; should redds be found then the full timing restriction of 1 October to 15 May will be required. The Caker Stream (WCX012) and Ryebridge Stream (WCX021) would be subject to constraints between 1 October to 28 February. The tributary of the Cove Brook (WCX047) would be subject to constraints between 15 March and 15 June. Any open cut crossing or in-channel works will only take place outside of the stated exclusion period. All dates are inclusive.
- PC1: The project would work with the Chertsey Agricultural Show to limit impacts to the Show at Chertsey Meads and along Mead Lane.
- PC2: The project would work with the South Downs National Park Authority (SDNPA) to limit impacts on major organised events taking place along the South Downs Way (SDW). Provided that the SDNPA has provided at least four weeks' notice of the event and its duration, the project will keep the SDW public right of way open (without use of the approved diversion) and will provide a suitable temporary surface and appropriate barriers to allow the safe crossing of the working area. The parties recognise that limited use of the haul road may be necessary during the event, however the project will mean that such usage will not cause disruption to the event.



- PC3: The project would work with the Farnborough Air Show, Rushmoor Borough Council and Surrey County Council to reduce traffic impacts on the Air Show.

2.2.2 In relation to the aforementioned commitments, where restrictions to working are required due to ecological seasonality, e.g. for hibernation or breeding of protected species, standard timings have been indicated. However, due to alterations in weather patterns and temperatures from year to year, the restricted season may alter. It would be at the discretion of the ECoW in consultation with Natural England, where applicable, to decide the actual dates for restriction of works.

2.2.3 A methodology and outline programme would also be produced to record the habitats suitable for common reptiles and to outline the method for the two-stage habitat manipulation. This would be undertaken in accordance with Commitment G196 which states that:

*'All habitats suitable for common reptiles would be subject to two-stage habitat manipulation between mid-March and mid-October. Firstly, vegetation would be cut to approximately 150mm (with the arisings removed) under the supervision of an ECoW and the site left for a minimum of two days to allow reptiles to move away from the area. Secondly, vegetation would be cleared down to ground level under the supervision of an ECoW. Vegetation clearance would be achieved using appropriate equipment based on the type of vegetation to be removed, the area affected, and the risk of killing or injuring reptiles. Construction works could commence immediately after completion of the second stage.'*

2.2.4 In addition, this section of the final CEMP will set out any site-specific timing constraints such as restrictions on noise, activities at schools within term time, or restrictions at sports grounds to accommodate major fixtures and avoid playing seasons, as set out in the CoCP and Site Specific Plans.

2.2.5 Certain advance works may take place prior to development consent where consented under alternative regimes, for example, the Town and Country Planning Act 1990. Any such early works would be controlled under the terms of the relevant planning permission and would not relate to development that can only be carried out under a DCO.

## **2.3 Environmental Pre-construction Surveys**

2.3.1 Baseline environmental surveys were undertaken as part of the environmental impact assessment and were recorded within the ES. Further pre-construction surveys would be required in areas where the existing baseline survey data need to be updated or supplemented (Commitment G33). The information obtained during the pre-construction surveys would be used to inform the final pipeline routing, whether specific working methods are required and the reinstatement proposals. It would also be used to finalise the protected species licences.

2.3.2 Pre-construction surveys would be undertaken in the next seasonally appropriate timeframe and into 2021, and would include:

- Archaeological trial trenching: This will commence before grant of DCO and would be undertaken by a specialist archaeological contractor. The results will be used to determine where preservation in situ can be applied and define the type

of archaeological mitigation by record which would be required. Further details can be found in the Archaeological Mitigation Strategy.

- Additional Phase 1 habitat survey at Southwood Golf Course SANG and Windlemere Golf Course SANG to update the baseline conditions as a result of the sites' changing management regime from golf courses to SANGs.
- Additional protected species surveys to support the final licence applications and to inform detailed site-specific measures for the exclusion and/or translocation of species during construction:
  - adder (*Vipera berus*) survey – between March and May at Bourley and Long Valley SSSI;
  - bat surveys – ground and climbing surveys for hibernation (January to March) and summer activity (May to September) across the project;
  - great crested newt surveys – habitat suitability surveys at previously unvisited ponds between mid-April and the end of June. Population estimate surveys at targeted ponds from the end of March until mid-June;
  - otter (*Lutra lutra*) and water vole (*Arvicola amphibious*) surveys – from mid-March until the end of June and then a second survey from July to October. These surveys would be to complete baseline survey where site access was previously denied;
  - terrestrial invertebrates survey – two surveys between April and September at Chobham Common SSSI; and
  - sand lizard survey – seven surveys between March and May at Chobham Common SSSI.
- Badger surveys – multiple survey types across the project to include sett monitoring from early spring onwards at targeted setts.
- Invasive non-native plant species survey – during the summer across the project.

2.3.3 The decision as to whether pre-construction surveys are required, as set out above, has been based the following points:

- where access is now available to land that was previously targeted for survey work but in respect of which access was previously denied;
- where professional judgement identifies a change to the baseline of an area to that reported in the ES and which requires further assessment, for example Southwood Golf Course SANG; or
- to update or confirm information on the location of sensitive archaeology or protected species.

2.3.4 In addition to the species-specific surveys, a walkover survey would be undertaken to validate existing information no more than three months prior to submission of the protected species licence applications to check for any further changes.

## **2.4 Construction Phase Activities**

2.4.1 A project description is set out within ES Chapter 3 (**Application Document APP-043**). This describes the main works that would be undertaken before, during and after installation including reinstatement. In addition, the CoCP contains information that sets out how the works would be undertaken in general and with regard to specific settings and comprise construction methodologies for:

- Open Cut;
- trenchless: auger bore;
- trenchless: horizontal directional drilling;
- streets;
- watercourses;
- woodland;
- Working near trees;
- hedgerows;
- schools;
- sports pitches and golf courses; and
- suitable alternative natural greenspace (SANGs).

2.4.2 In addition, Site Specific Plans have been developed for areas where there are a number of different site sensitivities and complexities between the environmental and engineering constraints. These locations were identified during the examination process, as areas that would require careful design and routeing. The locations where Site-Specific Plans have been developed are:

- Queen Elizabeth Park;
- Turf Hill;
- Fordbridge Park;
- Southwood Country Park;
- St Catherine's Road SANG (Clewborough);
- St James' School;
- Ashford Road; and
- Ashford Town Centre.

2.4.3 *'On completion of the installation works land used temporarily would be reinstated to an appropriate condition relevant to its previous use' (G94).*

## **2.5 Working Hours**

2.5.1 The approach to working hours is set out in Section 2.19 of the CoCP. It should be noted that a period of one hour may be utilised either side of the core construction working hours at the start and end of each day to include activities such as job start



meetings, toolbox talks, safety briefings, training, refuelling plant & equipment, setting up of material & equipment, installation of traffic management systems, and general housekeeping measures. Noise and light emissions will be kept to a minimum and these start-up and shut-down activities would not involve the operation of construction plant and equipment.



### 3 Project Team Roles and Responsibilities

#### 3.1 Environmental Management Systems

3.1.1 The contractor(s) would outline their environmental management systems here. For example, adherence to ISO 14001.

#### 3.2 Project Responsibilities

3.2.1 As part of the CEMP, the contractor(s) would be required to plan their works in advance to integrate the embedded design measures and agreed mitigation measures into the construction methods. This includes the measures set out within the CoCP.

3.2.2 Procedures for monitoring construction processes against the project environmental measures would be proposed by the contractor and an action plan would be put in place for recording actions within the tracker. Specific individuals and their roles would be identified, as well as control measures, training procedures, monitoring systems and emergency procedures to be employed throughout the different phases.

3.2.3 The contractor(s) organisational structure and the individual responsibilities for implementation of the measures at each stage of the project would be detailed in this section. Overall roles and responsibilities for the project would be presented in Table 3.1 in the final CEMP. Examples have been provided for illustration. These key roles would have overall responsibility for certain activities.

3.2.4 Additional Suitably Experienced Persons (SEP) that would be required on site in support roles for the ECoW would be identified for each stage, and their roles defined. For example, a land Contamination SEP would be appointed to use their professional judgement to take a proportionate approach to the assessment of potential for ground contamination based on the desk study information and field observations in accordance with Commitment G72. There may be several SEPs to allow for observation of more than one area at a given time, however the same person could undertake more than one role if suitably experienced.

**Table 3.1 Overall Roles and Responsibilities (Illustration only)**

Roles	Responsibilities
<i>Environmental Manager</i>	<i>The Environmental Manager would be responsible for the maintenance of all environmental plans and registers including ensuring that the environmental measures and mitigations are implemented on site and recorded within the CEMP. The Environmental Manager would be the main point of contact with the Engineering Manager and the Communications and Engagement Officer. They would also develop good working relationships with key stakeholders such as the Environment Agency, Natural England and the local authorities.</i>
<i>Environmental Clerk of Works (ECoW)</i>	<i>The ECoW would monitor that the works proceed in accordance with relevant environmental Development Consent Order requirements and adhere to the required mitigation measures. The ECoW would be supported as necessary by appropriate specialists (G3, G41)</i>

<b>Roles</b>	<b>Responsibilities</b>
<i>Archaeological contractor</i>	<i>A specialist archaeological contractor would be engaged to deliver archaeological trial trenching across the project. An archaeological watching brief would also be put in place if sensitive archaeological locations were identified.</i>
<i>Design engineer</i>	<i>The Design engineer would be responsible for the incorporation of environmental design criteria and method statements within the detailed design of the pipeline in consultation with the Environmental Manager.</i>
<i>Senior HSSE Lead</i>	<i>Responsible for all Health and Safety processes and procedures for the project.</i>
<i>First Aiders</i>	<i>Those identified in site inductions and method statements as people to contact in the event of minor injuries or incidents.</i>
<i>A suitably qualified and experienced arboriculturalist</i>	<i>This person would be expected to have the relevant experience to supervise tree works including tree removal, lopping, pruning, and protection of the root protection zones. They would be employed to oversee working methods relating to tree retention, protection and removal.</i>
<i>Soil suitably experienced person</i>	<i>This person would be expected to have the relevant experience to supervise the relevant aspects of the SMP. They would be employed to oversee the management of soil during soil stripping, handling, storage and reinstatement.</i>
<i>Land contamination suitably experienced person</i>	<i>This person would be expected to have the relevant experience to identify contamination risks and to identify suitable working methods and mitigation as appropriate based on desk study and field observations.</i>
<i>Land Agent</i>	<i>The Land Agent would provide the main liaison role between the Contractor and the relevant landowner. They will agree preconstruction conditions and sign off completion and handover.</i>
<i>Site Waste Manager</i>	<i>The Site Waste Manager would be responsible for day to day waste management and maintaining site waste registers/documentation.</i>
<i>Communications Lead</i>	<i>The Communications Lead would be the point of contact for and responsible for responding to any environmental issues or complaints at any time when construction work is being undertaken.</i>

3.2.5 In addition to the main responsibilities, there may be specific roles and responsibilities at specific times in the lifetime of the project. These would be presented in Table 3.2. This could include: pre-construction surveys; preparation of plans such as the Noise and Vibration Management Plan or applications for specific discharge consents.

**Table 3.2 Key Roles and Responsibilities During Specific Phases (Illustration only)**

<b>Roles</b>	<b>Responsibilities</b>	<b>Relevant Phase</b>
<i>Environmental Clerk of Works</i>	<i>Ecological pre-construction surveys</i>	<i>Enabling phase</i>
<i>Environmental Manager</i>	<i>Completion of licences and permits e.g. protected species licences, landfill permits, flood risk activities permits, discharge permits, site waste permits</i>	<i>Enabling phase</i>
<i>Soils SEP</i>	<i>Supervision of sensitive soils during topsoil stripping</i>	<i>Soil stripping</i>
<i>Site Foreman</i>	<i>Dewatering activities</i>	<i>Installation phase</i>



Roles	Responsibilities	Relevant Phase
Environmental Manager	Hydrostatic testing discharge consents	Post Installation phase

### 3.3 Site Checks and Reporting

- 3.3.1 Pre-site condition surveys would be undertaken by the contractor as part of the site set up. After construction, post site condition surveys would be undertaken by the contractor and discussed with the landowner prior to handover.
- 3.3.2 In accordance with Commitment G10, *'regular site checks would be carried out across the project to monitor accordance with the CEMP and other associated plans. Where nuisance is predicted or already occurring, appropriate remediation measures would be put in place to mitigate in accordance with measures outlined within the CoCP and CEMP. The frequency of inspections would be increased when activities with a high potential to cause nuisance are being carried out, or conditions increase the risk of nuisance e.g. windy conditions increase dust risk'*.
- 3.3.3 The programme of site inspections would be controlled by the Environmental Manager and implemented by the ECoW, who would draw on appropriate suitably experienced specialists for specific tasks. In accordance with Commitment G41, *'The ECoW would monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required mitigation measures. The ECoW would also be involved with any targeted additional mitigation strategies that may be required'*.
- 3.3.4 In accordance with commitment G9, *'A central Environmental Log would be set up. The Log would be available to view by the local authority if requested. It would be a living document and kept up to date and referred to on a regular basis. This would have three main purposes:*
- *to record all comments and complaints made to the site together with resulting actions and outcomes;*
  - *to record where and when environmental monitoring takes place and what if any action is required and when it has been completed; and*
  - *to record the results of site inspections and note the measures taken where required.'*
- 3.3.5 The results of inspections would be recorded in the Environmental Log. Findings would be disseminated to the wider construction team as appropriate and additional procedures put in place if required.

### 3.4 Information Training and Awareness

- 3.4.1 In accordance with Commitment G28, *'Construction workers would undergo training to increase their awareness of environmental issues. Topics would include but not be limited to:*
- *dust management and control measures;*
  - *location and protection of sensitive environmental sites and features;*



- *adherence to environmental buffer zones;*
- *noise reduction measures;*
- *working with potentially contaminated materials;*
- *flood risk response actions; and*
- *agreed traffic routes, access points etc.'*

- 3.4.2 In addition, in accordance with Commitment G172, '*ecological considerations would be included in the induction talks for all relevant site personnel. Species-specific or location-specific toolbox talks would also be provided, as required*'.
- 3.4.3 Contractor(s) would provide a training programme for construction workers within this section.

### **3.5 Emergency Procedures**

- 3.5.1 An Outline Emergency Action Plan can be found in Appendix A of this document. This outlines procedures to be implemented in case of unplanned events such as flooding and pollution incidents in accordance with Commitment G179. It will also provide contact details for during an emergency. The final Emergency Action Plan would be included in the final CEMP.

### **3.6 Reporting**

- 3.6.1 An action plan will be developed as a tool to track the implementation of the commitments during construction. The action plan would be checked by the Environmental Clerk of Work during their visits to the site and any non-compliance would be discussed with the contractor. In addition, the contractor(s) would develop a reporting structure so that activities on site are monitored and incidents are effectively actioned.

### **3.7 Complaints Procedure**

- 3.7.1 The name and contact details for the project would be displayed at the entrance to all compounds. This would include an emergency number (G27). In addition, details of the works including contact details would be provided to each community ahead of the work commencing. This would be as set out in the Community Engagement Plan.
- 3.7.2 Any complaints regarding environmental issues would be discussed with the construction manager and the environmental manager, and appropriate action would be taken and the conclusion recorded. A record would be made of the incident for audit purposes.



## 4 Consents and Permits

4.1.1 The project would be run in compliance with all relevant legislation, consents and permits in accordance with Commitment G44. The obtaining of all licences, consents and permits within the relevant timescales would be the responsibility of the contractor(s).

### 4.2 Consents, Permits and Licences

4.2.1 The contractor(s) would set up and maintain a register with details of consents, permits and licences required for the project including those which have been disapplied through the DCO process. This will be listed within Table 4.1 in the final CEMP. The licences and consents currently identified as being relevant to the project are listed in Table 4.1. This is not an exhaustive list, but would develop as the detailed design progresses, and into the construction phase.

**Table 4.1 Potential consents and permits relevant to the project**

Consent type	Consenting agency	Expected locations
Conservation of Habitats and Species Regulations 2017 Protected Species Licence: dormouse, great crested newt and rare reptiles	Natural England	Where protected species have been identified in the pre-construction surveys. Further licences may be required should additional protected species be identified prior to or during construction.
Wildlife and Countryside Act 1981 SSSI activity consent	Natural England	All locations where operations are likely to damage a SSSI.
Protection of Badgers Act 1992 Badger Licence	Natural England	Where badgers have been identified in the pre-construction surveys.
Environmental Permitting Regulations 2016 Flood Risk Activities	Environment Agency	Disapplication of certain licences, consents and permits is subject to ongoing discussions between Esso and the Environment Agency and will be agreed through the Protective Provisions, with the outcome reflected within the updated DCO. Flood risk activities are in relation to main river crossings both trenchless and Open Cut, watercourses within 8m of the trench and works within the floodplain.
Discharges to surface water and groundwater environmental permit	Environment Agency	The project expects to make use of the Environment Agency Regulatory Position Statement where practicable. Environmental permits would be applied for at locations dewatering for over six months either from a river at a rate of over 20m <sup>3</sup> per day or from groundwater at a rate of over 100m <sup>3</sup> per day. Exceptions apply should the dewatering be within 500m of a conservation site or within 250m of a spring, well or borehole used to supply water, where the limit of abstraction is reduced to 50m <sup>3</sup> . This may apply to some trenchless crossings, some rivers running parallel to the works and Open Cut areas with high groundwater levels.

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Consent type	Consenting agency	Expected locations
Environmental Permitting Regulations 2016 Variations of existing permits	Environment Agency	Home Farm North, Home Farm South and Laleham landfills. These landfills are currently subject to existing permits. Discussions are ongoing with the landfill owners/operators and the Environment Agency.
Protection of Military Remains Act 1986 Licence to carry out operations (if required)	Historic England	Esso will apply for a licence to carry out operations if necessary following an assessment of the significance of the archaeological remains according to the criteria for the selection of important sites, set out in 'Military Aircraft Crash Sites, Archaeological guidance on their significance and future management' (English Heritage, 2002).