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Long Strip Construction Environmental Management Plan

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Executive Summary

This Long Strip Construction Environmental Management Plan (“Long Strip CEMP”) has been prepared in relation to the application (“the Application”) made by ABP to the Secretary of State (“SoS”) for Transport, seeking development consent to construct, operate and maintain the Immingham Green Energy Terminal (“the Project”). The Project would facilitate the import and export of liquid bulks associated with the energy sector and is supported by associated development on the landside.

Subject to the grant of consent for the Project by the SoS, Final CEMPs (including relevant supporting plans) will be provided in relation to relevant parts of the Project in accordance with the measures contained within the **Outline CEMP [TR030008/APP/6.5 (7)]** following the appointment of the contractor(s), as secured by Requirement 6 of Schedule 2 of the **draft Development Consent Order (“DCO”) [TR030008/APP/2.1 (8)]**.

This Long Strip CEMP is prepared as the Final CEMP in relation to the works to remove the trees and other vegetation within Long Strip pursuant to Requirement 6(5). This Long Strip CEMP is intended to be a certified document with which the Applicant must comply in undertaking the works to remove trees and vegetation in Long Strip, and this document is included in the list of certified documents in Schedule 15 of the **draft DCO** on this basis.

The Long Strip CEMP sets out the measures that will be applied by the contractor to provide effective planning, management and control during the clearance of trees and vegetation from Long Strip within Work No. 1 and Work No. 2 to mitigate the impacts and effects on people, businesses, and the natural and historic environment. The works to remove the trees and vegetation in Long Strip have been separated into a standalone CEMP to minimise delay to these works being undertaken while the Final CEMP for the wider Project is negotiated and approved. This is particularly important given the desire to undertake these tree removal works to Long Strip outside of the bird nesting season (where possible).

The main part of this Long Strip CEMP is **Section 3**, which comprises the ‘Impact Avoidance and Mitigation Measures Implementation Plan’. This presents a Register of Environmental Actions and Commitments (“REAC”) for each environmental topic assessed within the Environmental Impact Assessment (“EIA”). Each table sets out the mitigation and management measures to be followed. It also sets out, where relevant, what monitoring is required and identifies the responsible party for each mitigation/enhancement measure or monitoring requirement.

1 Introduction

1.1 Overview

- 1.1.1 This Long Strip CEMP sets out a series of proposed measures that would be applied by the contractor to provide effective planning, management and control during tree and vegetation clearance of Long Strip (the “works”) to mitigate the impacts and effects on the retained woodland. This Long Strip CEMP has been prepared alongside the **Woodland Compensation Plan** and is in accordance with the **Outline CEMP** prepared for the Immingham Green Energy Terminal (“the Project”). The purpose of this Long Strip CEMP is to control construction activities for the works so as to minimise, as far as reasonably practicable, impacts on the environment.
- 1.1.2 The likely significant environmental effects of the Project have been identified through the EIA process and are reported in the **Environmental Statement (“ES”)**. The standard or best practice mitigation and construction management and control measures accounted for in the EIA process, as presented within the ES, will be implemented during construction of the Project. This Long Strip CEMP explains how these commitments will be implemented for the works and sets out the monitoring and auditing activities to be undertaken to demonstrate that such mitigation and measures are carried out and are effective.
- 1.1.3 The structure of this Long Strip CEMP is as follows:
- a. **Section 1** introduces the Long Strip CEMP, the Project, the works and the Applicant.
 - b. **Section 2** sets out the programme, working hours, traffic management protocols, site lighting, recycling requirements, and best practice measures.
 - c. **Section 3** presents:
 - i. Impacts and effects of the works, as identified throughout the EIA process.
 - ii. Mitigation and enhancement measures to be delivered during the works.
 - iii. The responsible person who will deliver the mitigation and enhancement measures.
- 1.1.4 The Long Strip CEMP should be read alongside the **Woodland Compensation Plan [TR030008/EXAM/9.34 (3)]** and **Appendix 8.F: Arboricultural Impact Assessment [APP-185]**, of the Application.

1.2 The Applicant

- 1.2.1 ABP was established in 1981 following the privatisation of the British Transport Docks Board. It is the largest ports group in the UK, owning and operating 21 ports and other transport-related businesses across England, Wales and Scotland.
- 1.2.2 On the Humber, ABP owns and operates four ports, namely the Port of Immingham (“the Port”) and the ports of Hull, Grimsby and Goole, which together

constitute the largest ports complex in the UK. The Port is the largest and busiest of ABP's four Humber ports.

- 1.2.3 ABP's statutory undertaking at Immingham, the 'statutory port estate', covers some 480 hectares (ha). The majority of the port estate falls within the administrative boundary of North East Lincolnshire Council ("NELC"), although the western part of the Port falls within the administrative boundary of North Lincolnshire Council.
- 1.2.4 The Port comprises a number of discrete operational areas handling a diverse trade base including liquid fuels, solid fuels, ores, and ro-ro freight being handled from existing in-river jetties. These include the Eastern and Western Jetties, the Immingham Oil Terminal, the Immingham Gas Terminal, Immingham Outer Harbour and the Humber International Terminal.
- 1.2.5 The Project, if consented, will be located fully within an extended Port of Immingham Statutory Harbour Authority ("SHA") area where the Applicant is the SHA. In this capacity, the Applicant has a set of powers and duties which include the management and regulation of the safety of navigation and marine operations in its SHA area.

1.3 The Project

- 1.3.1 The main Project comprises the following:
- i A Terminal jetty for liquid bulks (**Work No. 1**).
 - ii A Jetty Access Road between the new jetty and Laporte Road (**Work No. 2**).
 - i. 'East Site - Ammonia Storage' (**Work No. 3**).
 - ii. Construction of a culvert (**Work No. 4**) under Laporte Road.
 - iii. 'East Site – Hydrogen Production Facility' (**Work No. 5**).
 - iv. Underground pipelines, pipes, cables and other conducting media (**Work No. 6**), between the East and West Sites.
 - v. 'West Site' (**Work No. 7**) involving the construction of up to three hydrogen production units with associated flue gas stacks and flare stacks and up to four liquefier units.
 - vi. Formation of temporary construction and laydown areas on Queens Road (**Work No. 8**) and off Laporte Road (**Work No. 9**).
 - vii. Temporary removal of street furniture and modification of overhead cables on Kings Road (**Work No. 10**).
- 1.3.2 For the construction of the Jetty Access Road (Work No. 2), an area of the existing Long Strip Woodland would require clearance for construction.
- 1.3.3 Further information on the Project is provided in **Chapter 2: The Project [AS-069]**. See **Section 2.4** within **Chapter 2: The Project** for further details regarding Work Nos. which are referenced throughout this document.

1.4 Construction Activities

1.4.1 The works are required for a variety of reasons including:

- i the need for a sufficient footprint to facilitate some of the main elements of the development;
- ii to avoid inappropriate tree retention close to new structures; and
- iii to maintain a 2m clear zone from the proposed security fencing to minimise the risk of inadvertently facilitating unauthorised access over the fence.

1.4.2 The Long Strip woodland is subject to a Tree Preservation Order (“TPO”) which applies to the whole woodland block, 2.77ha, including the area on the south side of Laporte Road, which is within the Order Limits only for the purposes of restricting public access during construction and which is not otherwise directly affected by the Project. The site is situated over 1km from the nearest residential property and therefore the nearest human noise sensitive receptor.

1.4.3 The area of TPO to be removed as part of the works, equates to an area of 6440.6m² (0.64406ha). The design of Work No. 2 has been carefully considered in this area to minimise tree loss and to safeguard those trees of the highest quality where feasible. The number of trees to be removed within and outside of the Long Strip TPO designation are detailed in **Table 1-1**.

Table 1-1 Tree removals within Long Strip TPO

	Category A (high quality, minimum of 40+ years remaining contribution)	Category B (moderate quality, minimum of 20+ years remaining contribution)	Category C (low quality, minimum of 10+ years remaining contribution)	Category U (Unsuitable for retention, <10 years remaining contribution)
Trees to be removed within the TPO designation for Work No.2 and the area of Work No. 1 landside of Mean High Water Springs	8 individual trees	106 individual trees, 1 tree group, 6 part tree groups	68 individual trees, 2 part tree groups and 1 part hedge	23 individual trees

1.4.4 Compensation in respect of tree removal will be implemented, and will include new tree planting as detailed in the **Woodland Compensation Plan [TR030008/EXAM/9.34 (3)]**. Requirement 11 of the **draft DCO** requires compliance with the approved Woodland Compensation Plan which is intended to be a certified document and is listed as such in Schedule 15 of the **draft DCO [TR030008/APP/2.1 (8)]**.

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- 1.4.5 Tree loss and the impact of exposure on adjacent retained trees is minimised by undertaking pollarding or coppicing works to trees in immediate proximity to the boundary of the site. This approach will be used to minimise tree loss in the Long Strip TPO woodland. The suitability of individual trees on the site margins for pollarding or coppicing will be assessed by a walkover of the Site by the Site Arboriculturist prior to the commencement of site works.
- 1.4.6 All tree work is to follow the principles of BS 3998:2010 Tree work – Recommendations (Ref 5-1) and must be carried out by suitably qualified and insured contractors.
- 1.4.7 A tree condition survey will be undertaken by the Site Arboriculturist immediately following the tree removal works within the Long Strip woodland to identify any safety risks to the Site.

2 The Works

2.1 Programme

- 2.1.1 The works are programmed to commence upon the granting of development consent for the Project, in February 2025. The works are scheduled to take four weeks commencing at the end of February. The intention is to undertake the works as soon as possible following the granting of development consent, to avoid the bird nesting season.
- 2.1.2 Prior to the works commencing, a detailed programme of works will be provided to NELC for information.

2.2 Working Hours

- 2.2.1 The works will take place between 07:00 and 19:00 Monday to Saturday. No works will take place on Sundays and Bank Holidays.

2.3 Wheel Cleaning Facility

- 2.3.1 In the interests of highway safety, wheel cleaning facilities will be installed for the works. All plant will be required to use the wheel wash prior to exiting the Site back onto the highway. The storage of materials and any washing, mixing or refuelling will take place in agreed allocated areas at least 5m from the edge of the Root Protection Area (“RPA”) of retained trees.

2.4 Recycling and Disposal of Waste

- 2.4.1 The contractor will minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arisings, as far as reasonably practicable.
- 2.4.2 The contractor will be required to segregate waste streams on-site, prior to them being taken to a waste facility for recycling or disposal. All waste removal from the Site would be undertaken by licensed waste carriers and taken to licensed waste facilities.

2.5 Best Practice Measures

- 2.5.1 Construction industry guidance (e.g. from the Construction Industry Research and Information Association (“CIRIA”)) will be adopted as far as reasonably practicable to assist in reducing the potential for pollution and nuisance. This will be achieved by employing best practice measures.
- 2.5.2 The works will be undertaken in accordance with BS 3998:2010 Tree work – Recommendations (Ref 5-1) by suitably qualified and insured contractors.

3 Impact Avoidance and Mitigation Measures Implementation Plan

3.1 Management and Mitigation Plan

3.1.1 This section of the Long Strip CEMP presents a REAC for each environmental topic. It also sets out the monitoring strategy and the responsible party identified for each mitigation/enhancement measure or monitoring requirement.

Table 3-1: Air Quality

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
Emissions from non-road mobile machinery and site plant.	It is best practice to mitigate emissions to air. Measures to reduce emissions from the works include taking steps to: <ul style="list-style-type: none"> a) Prohibit unnecessary idling of vehicle engines. b) Encourage/promote the use of cleaner engines and fuel. 	Contractor	NELC Highways Department

Table 3-2: Nature Conservation (Terrestrial Ecology)

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
Any impacts on terrestrial habitats	Measures to be followed to prevent disturbance to nesting birds is outlined below: <ul style="list-style-type: none"> a) Construction temporary lighting will be arranged so that glare would be minimised outside the construction site. b) Works on vegetation that may support nesting birds will be undertaken outside the breeding bird season (avoiding the period March to August inclusive) where possible, for compliance with the Wildlife and Countryside Act 1981 (as amended). Where this is not possible, pre-clearance nest checks by an 	Contractor and ECoW	NELC

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
	<p>Ecological Clerk of Works (“ECoW”) will be undertaken. Where active and occupied nests are identified, an appropriate buffer zone (at least 2m) will be established around the nest site and the nest monitored until any young have fledged. The ECoW will advise on an appropriate exclusion zone. Typical minimum exclusion zones are 5m for tree/hedge nesting birds and 10-20m for ground nesting birds (not including Schedule 1 birds). No clearance of vegetation within the exclusion zone would be undertaken until any young have fledged and the nest confirmed to be unoccupied.</p>		
Loss of woodland habitat and bat roosts in Long Strip.	<p>Where mature trees within the Long Strip woodland with low bat roost potential would be impacted and cannot reasonably be avoided, trees will be felled under ECoW supervision.</p> <p>Any trees to be removed that have previously supported a bat roost (T32 is the only tree to confirm support of bat roosts) will be removed under the supervision of an ecologist holding a Bat Low Impact Class Licence from Natural England.</p> <p>Felled material to be retained for the creation of habitat log piles within retained woodland as set out in the Woodland Compensation Plan [TR030008/EXAM/9.34 (3)].</p> <p>Appropriate Root Protection Areas (RPA) around retained trees to be implemented as identified on the Tree Protection Plan (see Appendix 8.F: Arboricultural Impact Assessment [APP-185]) must be fully respected and their location and significance is to be highlighted to all site staff and contractors during the formal site briefing.</p>	Contractor and ECoW	NELC and Natural England
Loss of/ damage to	<p>All construction site facilities including site huts, staff and contractor parking and areas for storage will be located outside of the RPA and crown spread of retained trees, including those not specifically covered in Appendix 8.F: Arboricultural</p>	Contractor and ECoW	NELC

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
<p>woodland and trees</p>	<p>Impact Assessment [APP-185]. Space is likely to be constrained on the Site and will need to be carefully considered. The Construction Exclusion Zones identified on the Tree Protection Plan (see Appendix 8.F: Arboricultural Impact Assessment [APP-185]) must be fully respected and their location and significance is to be highlighted to all site staff and contractors during the formal site briefing.</p> <p>The use, mixing and washing of materials can lead to runoff or inadvertent spillage into tree root zones. Many substances often used on construction sites can be toxic to tree roots (such as concrete, fuels, salts, builder's sand and herbicides) and can result in the death of tree roots and beneficial soil organisms and can have a significant impact on the future health and appearance of the tree.</p> <p>The storage of materials and any washing, mixing or refuelling will take place in agreed allocated areas at least 5m from the edge of the RPA of retained trees.</p> <p>Particular care is required where high sided vehicles, long reach machinery and plant with jibs, booms and counterweights are to operate within proximity to retained trees. A banksman will be used where the movement of plant or long reach machinery occurs within 5m of any part of a retained tree to ensure no damage is sustained.</p> <p>A tree condition survey would be undertaken by the Site Arboriculturist immediately following the works within the Long Strip woodland to identify any safety risks to the Site.</p> <p>The suitability for pollarding or coppicing would be assessed by a walkover of the Site by the Site Arboriculturist and agreed with the NELC Tree Officer prior to the commencement of site works.</p>		

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
	<p>An Arboricultural Method Statement will be provided to NELC prior to works being started and will include:</p> <ul style="list-style-type: none"> a) Summary of the final arboricultural impacts related to the detailed design. b) Pre-commencement meeting, site briefing and assessment of trees to be removed by an arboriculturist for their suitability for tree pruning. c) Order and phasing of operations. d) Site supervision and monitoring of implementation. e) Tree works and confirmation of the final extent of tree loss. f) Movement of people, plant and materials. 		

Table 3-3: Ornithology

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
Direct loss of breeding bird (non-Special Protection Area/Ramsar) habitats	<p>Standard Mitigation Measures</p> <p><u>Impacts on Nesting Birds (construction)</u></p> <p>The clearance works will be undertaken outside the nesting bird season (avoiding the period March to August inclusive), where possible, for compliance with the Wildlife and Countryside Act 1981 (as amended).</p>	Contractor and ECoW	Natural England

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
	Where this is not possible, pre-clearance checks by an ECoW will be undertaken of vegetation to identify any nesting species. Where active and occupied nests are identified, an appropriate buffer zone (at least 2m) will be established around the nest site and the nest monitored until any young have fledged. The ECoW will advise on an appropriate exclusion zone. Typical minimum exclusion zones are 5m for tree/hedge nesting birds and 10-20m for ground nesting birds (not including Schedule 1 birds). No clearance of vegetation within the exclusion zone would be undertaken until any young have fledged and the nest confirmed to be unoccupied.		

Table 3-4: Landscape and Visual Impact

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
Loss of trees within the Long Strip woodland.	During construction, trees to be retained in adjacent areas would be clearly fenced or marked so that site operatives are in no doubt as to which ones are to be kept and protected.	Contractor	NELC
Introduction of construction lighting.	Construction temporary lighting will be arranged so that glare would be minimised outside the construction site.		

Table 3-5: Ground Conditions and Land Quality

Potential Impact	Mitigation/Enhancement Measure	Responsibility	Enforcing body
Risks to construction workers	Construction workers on Site will adhere to site-specific health and safety assessments. Site-specific risk assessments and the use of personal protective equipment will form a pre-requisite for workers coming onto Site and would be produced as part of the detailed Method Statement which will be prepared by the Contractor.	Contractor	NELC Environment Agency

3.2 Implementation and Operation

3.2.1 The following roles are defined for the works, with final names of those responsible to be confirmed with NELC prior to works commencing, alongside the provision of a detailed Method Statement from the chosen contractor:

Project Manager

3.2.2 The Project Manager will be responsible for ensuring that this CEMP and the **Woodland Compensation Plan [TR030008/EXAM/9.34 (3)]** are adhered to and a copy of those documents will be retained on site. Any updates that may be needed to the Arboricultural Method Statement will be communicated and agreed with NELC officers prior to commencement and a record of amendments made.

3.2.3 The Project Manager will appoint an Environmental Site Officer to ensure that environmental issues are identified and addressed and any new issues are appropriately managed with implementation of control measures in accordance with this Long Strip CEMP.

3.2.4 The Project Manager will communicate the Long Strip CEMP and **Woodland Compensation Plan [TR030008/EXAM/9.34 (3)]** to employees, contractors and site representatives.

Site Manager

3.2.5 The site manager will ensure that all materials and plant are safe and secure and that any waste is managed in accordance with this Long Strip CEMP and will:

- i Ensure that appropriate signage is used across the site.
- ii Ensure appropriate first aid coverage across the site in terms of trained staff and facilities and communicate these to site workers and visitors.
- iii Ensure that all inductions are undertaken for those working on and or visiting the site and implement environmental briefings and toolbox talks prior to operations.
- iv Ensure that site-specific Risk Assessments and Method Statements (“RAMS”) are developed, communicated and understood by all working on or visiting the site.

Health Safety Environment (“HSE”) Manager

3.2.6 The HSE manager will ensure that all works are being undertaken safely and will:

- i Ensure that the works are being undertaken in accordance with the agreed RAMS.
- ii Ensure this Long Strip CEMP is implemented throughout the works.

4 Monitoring

4.1 Monitoring

- 4.1.1 Environmental monitoring of the works and the impacts will be undertaken throughout the works.
- 4.1.2 Specific monitoring requirements are presented in **Table 4-1**.

Table 4-1: Monitoring Requirements

ES Chapter	Monitoring Requirements
ES Chapter 8: Nature Conservation (Terrestrial Ecology) [APP-050]	An ECoW will be present during construction as appropriate, and during tree removal in particular, to oversee implementation of impact avoidance commitments.

- 4.1.3 As part of the monitoring process, the contractor will allocate a designated Environmental Site Officer(s), who will be present on Site throughout the works and when new activities are commencing. The Environmental Site Officer will observe site activities and report any deviations from the CEMP in a logbook, along with the action taken and general conditions at the time. The Applicant will be informed of any deviations from the Long Strip CEMP as soon as possible following identification of such issues. The Environmental Site Officer will also act as day-to-day contact with the relevant stakeholders.
- 4.1.4 During the works, the Environmental Site Officer will conduct daily walkover surveys to ensure all requirements of this Long Strip CEMP are being met. Action from these surveys will be documented in an Environmental Action Schedule, discussed with the Site Manager for programming requirements and issued weekly for actioning.
- 4.1.5 The Project Manager will arrange regular formal inspections to ensure the requirements of this Long Strip CEMP are being met. After completion of the works, the Environmental Site Officer will conduct a final review.
- ### 4.2 Records
- 4.2.1 The Environmental Site Officer and/or Project Manager together with the ECoW will retain records of environmental monitoring and implementation of this Long Strip CEMP. This will allow the provision of evidence that this Long Strip CEMP is being implemented effectively. These records will include:
- a. Environmental Action Schedule;
 - b. Licences, permits and approvals;
 - c. Results of inspections by Environmental Site Officer/Project Manager;
 - d. Other environmental surveys and investigations; and

e. Environmental equipment test records.

4.2.2 This Long Strip CEMP will be updated as necessary throughout the works.

5 References

- Ref 5-1 British Standards Institution (2010). BS 3998:2010 Tree work. Recommendations.

6 Glossary

Abbreviation / Acronym	Definition
ABP	Associated British Ports
AP	Air Products
BPM	Best Practical Means
BSI	British Standards Institution
CEMP	Construction Environmental Management Plan
CIRIA	Construction Industry Research and Information Association
DCO	Development Consent Order
ECOW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
HSE	Health Safety and Environment
NELC	North East Lincolnshire Council
NSIP	Nationally Significant Infrastructure Project
PA 2008	Planning Act 2008
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
RAMS	Risk Assessments and Method Statements
REAC	Register of Environmental Actions and Commitments
RPA	Root Protection Area
SHA	Statutory Harbour Authority
SoS	Secretary of State for Transport
TPO	Tree Preservation Order
UK	United Kingdom