

Southampton to London Pipeline Project

Construction Environmental Management Plan (CEMP)

Revision No. 2.0

June 2021

South Downs National Park Authority





Contents

1	Introduction	1
1.1	Overview.....	1
1.2	Purpose of the Construction Environmental Management Plan.....	1
1.3	Change Process	2
1.4	Structure of the Construction Environmental Management Plan.....	4
2	Design and Construction	6
2.1	Project Commitments.....	6
2.2	Construction Schedule	7
2.3	Environmental Pre-construction Surveys	8
2.4	Construction Phase Activities	9
2.5	Compounds	9
2.6	Working Hours	10
3	Project Team Roles and Responsibilities	12
3.1	Environmental Management Systems	12
3.2	Project Responsibilities	12
3.3	Site Checks and Reporting.....	13
3.4	Information Training and Awareness	15
3.5	Emergency Procedures.....	15
3.6	Reporting	16
3.7	Complaints Procedure.....	16
4	Consents and Permits	17
4.1	Consents, Permits and Licences	17

Appendix A: Emergency Action Plan

Appendix B: Water Management Plan

Appendix C: Site Waste Management Plan

Appendix D: Dust Management Plan

Appendix E: Noise and Vibration Management Plan

Appendix F: Soil Management Plan

Appendix G: Lighting Management Plan



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
SEP	Suitably Experienced Person
SSSI	Site of Special Scientific Interest
SSP	Site Specific Plan



1 Introduction

1.1 Overview

- 1.1.1 Esso Petroleum Company, Limited (Esso) has been granted a Development Consent Order (DCO) by the Secretary of State to replace 90km (56 miles) of an existing pipeline with 97km of new 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 within this local authority area is broken down into eight stages. These are based on geographical areas. South Downs National Park Authority is host to 24.7km of the 97km pipeline route. This Construction Environmental Management Plan (CEMP) specifically applies to the section of works between (453 773E, 118 368N) and (465 956E, 130 454N), and between (468 528E, 134 052N) and (472 166E, 137 621N), in the South Downs National Park. This is shown on Sheets 2, 3, 4 and 5 in the Stages of the Authorised Development.
- 1.1.4 It is anticipated that works to install the pipeline will start in 2021 and be completed in 2023. The installation of the pipeline is planned to be completed within a two-year construction period. On completion of the installation works the contractor will hydrotest the pipeline and any post-construction monitoring required will be carried out.
- 1.1.5 The development authorised by the DCO must be undertaken in accordance with the 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 to be 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 will be undertaken during construction. The CEMP enables the environmental commitments made within the Environmental Statement (ES) to be actioned within the project.



- 1.2.3 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.
- 1.2.4 All operatives will be briefed by the Principal Contractor on the specific details within the CEMP prior to the commencement of works within South Downs National Park. The briefings will be delivered by a suitably trained member of the team such as the site supervisor, Construction Manager, Environmental Manager or Environmental Clerk of Works (ECOW).
- 1.2.5 The project commitments and actions will be tracked during construction as outlined in Section 3: Project Team Roles and Responsibilities. The following sensitive environmental features have the potential to be affected by the construction of the authorised development within South Downs National Park:
- hedgerows within and adjacent to Order Limits;
 - six parcels of Ancient Woodland <20m from Order Limits;
 - two Tree Preservation Orders within Order Limits;
 - four unnamed watercourses; and
 - tranquillity and dark skies.

1.3 Change Process

- 1.3.1 This section sets out how change would be managed if this was necessary in order to implement the project. It creates a category of "Technical Variation" for the approval of minor variations by the relevant authority that Esso considers does not require formal evaluation under paragraph 20 of Schedule 2 of the DCO (Amendments to approved details).
- 1.3.2 For those more significant changes that need to be considered under paragraph 20 it sets out a process for distinguishing which changes may need to be considered under paragraph 20(2). Changes that may result in likely significant effects on the environment that are not assessed in the environmental statement may require further assessment by the relevant authority. A change which Esso considers does not require further assessment is termed a "Non-material Change" below. A change that Esso considers does require further assessment and therefore a discussion to determine what assessment is required is termed a "Material Change" below.
- 1.3.3 In each case under this section it is open for relevant authority to require more stringent evaluation if it considers this necessary.

Technical Variation (not covered by Paragraph 20 (Amendments to approved details))

- 1.3.4 By agreement with landowners and relevant regulatory bodies it may be necessary to amend the details contained in the CEMP and its supporting appendices as a result of the iterative discussion and engagement that will continue after the CEMP



has been approved. The resulting technical variation would not alter any of the underlying commitments, mitigations and methodologies set out in the CEMP. An example may be preconstruction surveys identify that a measure already committed to is no longer required in the Construction Environmental Management Plan.

- 1.3.5 Where there is a proposed technical variation, Esso will provide details to the Relevant Planning Authority together with evidence of relevant stakeholder approval whereupon, the Relevant Planning Authority will, acting reasonably, endeavour to respond within 10 business days to either confirm its consent to the technical variation or provide its reasons why the change is not accepted including where it considers the requested variation is a Non-material or a Material Change (as described below). If declined, Esso may then withdraw the request, or treat the request as a Non-material or a Material Change.

Other Changes (covered by Paragraph 20 (Amendments to approved details))

- 1.3.6 During the implementation of the Project it may be necessary or prudent to seek an alternative approach to the commitments, mitigations and methodologies set out in this approved CEMP. Pursuant to Paragraph 20 of Schedule 2 of the DCO, Esso and South Downs National Park Authority will adopt the following procedure in respect of a requested change to the requirements of the CEMP.

Non Material Change

- 1.3.7 Where Esso and its expert advisers reasonably consider that the proposed change is not likely to give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement, this would be presented as a Non-material Change.
- 1.3.8 Esso will submit the proposed change to South Downs National Park Authority with details of the requested change (including any amendments to the relevant mitigation measures) together with a summary of why Esso considers the change to be a Non-material. Upon receipt of the request South Downs National Park Authority will, acting reasonably, endeavour to respond within 15 business days to either confirm its consent to the Non-material Change or provide its reasons why the change is not accepted. It should be noted that consent is deemed to be approved if no formal decision is made by the relevant authority within 42 days of the initial application. If declined, Esso may then withdraw the request, treat the request as a Material Change or appeal the decision in accordance with Schedule 2 of the DCO.

Material Change

- 1.3.9 Where Esso and its expert advisers reasonably consider that the proposed change is likely to give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement, this would be presented as a Material Change.
- 1.3.10 Esso will discuss the proposed change with South Downs National Park Authority together with its proposals for appropriately assessing the Material Change. Upon receipt of the assessment proposals, South Downs National Park Authority will,



acting reasonably, endeavour to respond within 10 business days to comment on the assessment proposals.

- 1.3.11 Following subsequent assessment of the proposed change in accordance with any comments received Esso will submit the proposed change to South Downs National Park Authority with details of the requested change (including details of any amendments to the relevant mitigation measures) together with the findings of the assessment and the reasons why Esso considers the change is unlikely to give rise to any materially new or materially different environmental effects in comparison with the authorised development as approved (as identified in the environmental statement). Upon receipt of the request South Downs National Park Authority will, acting reasonably, endeavour to respond within 15 business days to either confirm its consent to the Material Change or provide its reasons why the change is not accepted. It should be noted that consent is deemed to be approved if no formal decision is made by the relevant authority within 42 days of the initial application. If declined, Esso may then withdraw the request or appeal the decision in accordance with Part 2 of the DCO.

1.4 Structure of the Construction Environmental Management Plan

- 1.4.1 The CEMP is an overarching document that contains several 'daughter' documents as appendices. These will contain more detailed information on particular topic areas. 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 will 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 will be protected, stored and reinstated as part of the works. It also outlines the monitoring and reporting that will 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.



1.4.2 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 CEMP and other documents are set out in Illustration 1.1 of the Code of Construction Practice (CoCP). The key documents include:

- Code of Construction Practice: The CoCP provides a consistent approach to the control of construction activities along the entire pipeline and mitigates potential impacts on people and the environment. The CoCP is a certified document with compliance secured under Requirement 5 of the DCO.
- Landscape and Ecological Management Plan (LEMP): This sets out the proposals in terms of landscape and ecology within South Downs National Park. The LEMP will contain the reinstatement plans. The LEMP will be approved by South Downs National Park Authority in accordance with Requirement 12 of the DCO.
- 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 will be approved by South Downs National Park Authority in accordance with Requirement 7 of the DCO.
- 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 will be managed. The final CEP will be approved by South Downs National Park Authority 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 landowners, 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.
- 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.
- 2.1.3 Many of these features were avoided through the final design of the Order Limits. Where features still lie within the Order Limits and where additional commitments have been made, these are secured within the design and set out in Table 3.1 in the CoCP. Within the South Downs National Park, the following commitments have been made:
- D6a - South of Sailors Lane, the construction compound measuring up to 55m by 52m to be located at Stephens Castle Down (Works No. 4F on Sheet 6 of the Works Plan at CO-4F) is no longer required and will be removed from the works description in Schedule 1. An area adjacent to the working width measuring 15m by 55m will still be required as part the construction of a trenchless crossing (TC002) beneath Stake's Lane.
 - D8 - Compound to be located to the north of Wheely Down Road to avoid views from South Downs Way (Works Plan Sheet 9).
- 2.1.4 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. The reduced working widths within the South Downs National Park are:
- NW3 - Farringdon: Working width reduced to 10m to reduce impacts on Priority Habitat and visual impacts for users of Public Rights of Way over an approximate distance of 53m. (Grid ref: SU7009235638 to SU7013235673, Works Plan Sheet 18).
- 2.1.5 Trenchless crossings: For most of the route, the pipeline would be installed using an open cut technique. However, trenchless techniques will be adopted in the following locations within the South Downs National Park:
- TC002 – Stake's Lane (Works Plan Sheet 6);
 - TC004 – A272 (Works Plan Sheet 11/12); and
 - TC006 – A32 (Works Plan Sheet 19).



2.2 Construction Schedule

2.2.1 It is anticipated that works to install the pipeline will start in 2021 and be completed in 2023.

2.2.2 Within South Downs National Park, the programme is anticipated to follow the phasing shown in the stages of authorised development (Requirement 3). Within the South Downs National Park, the works have been scheduled to take place during the summer months, to limit potential impacts to agricultural land from wet and adverse weather. It also accommodates the following good practice measures:

- G35 - Bird Breeding Season: 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 Ecological Clerk of Works (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 GCN; habitat manipulation for dormice and reptiles).
- G196 - All habitats suitable for common reptiles would be subject to two-stage habitat manipulation between mid-March and mid-October. .
- PC2 The project would work with the South Downs National Park Authority to limit impacts on major organised events taking place along the South Downs Way. Provided that the South Downs National Park Authority has provided at least 4 weeks notice of the event and its duration, the project will keep the South Downs Way PRow 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 ensure that such usage will not cause disruption to the event.

2.2.3 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 will be at the discretion of the ECoW in consultation with Natural England, where applicable, to decide the actual dates for restriction of works.

2.2.4 Habitats suitable for common reptiles, at the locations set out below or as otherwise stated by the Ecologist, would be subject to two-stage habitat manipulation. This will be undertaken in accordance with Commitment G196.

- Between Bigpath Lane and Belmore (north of Hedgerow Crossing (HDX) 043);



- Between HCX047 and HCX 048;
- Field Boundary North of HCX 057; and
- Between HCX 130 and HCX131.

2.3 Environmental Pre-construction Surveys

2.3.1 Baseline environmental surveys were undertaken as part of the EIA and were recorded within the ES. Further pre-construction surveys have been carried out to supplement the baseline information as per the requirements of Commitment G33.

2.3.2 Pre-construction surveys include:

- archaeological trial trenching – the results will be used to determine where preservation in situ can be applied, and to define the type of archaeological mitigation by record which would be required. Further details can be found in the Archaeological Mitigation Strategy;
- 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:
 - bat surveys – ground and climbing surveys for hibernation and summer activity across the project;
 - great crested newt surveys – habitat suitability surveys at previously unvisited ponds between mid-April and the end of June;
 - otter (*Lutra lutra*) and water vole (*Arvicola amphibius*) surveys – from mid-March until the end of June and then a second survey from July to October. These surveys will be to complete baseline survey where site access was previously denied;
- badger surveys – multiple survey types across the project to include sett monitoring from early spring onwards at targeted setts; and
- invasive non-native plant species survey – during the summer across the project.

2.3.3 As per Commitment G33, the decision as to whether pre-construction surveys are required, as set out above, has been based on 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; 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 will 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.



- 2.3.5 The project will have licensed ecologists available to take account of changes to the programme which may affect mitigation measures and require further pre-surveys to those already carried out/scheduled.

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 will be undertaken before, during and after installation including reinstatement. In addition, the CoCP contains information that sets out how the works will be undertaken in general and with regard to specific settings, and will comprise construction methodologies for:

- open cut;
- trenchless crossings;
- streets;
- watercourses;
- woodland;
- working near trees;
- hedgerows;
- schools;
- sports pitches and golf courses; and
- suitable alternative natural greenspaces.

- 2.4.2 In addition, SSPs 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 will require careful design and routing.

- 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 Compounds

- 2.5.1 Dedicated compound areas will provide welfare facilities, storage, and short-term offices for site-based staff. Compounds within South Downs National Park Authority are:

- Compound CO-4E: north of B2177 Winchester Road;
- Compound CO-4F: western intersection of Stake's Lane and Bigpath Lane;
- Compound CO-4G: south of Kilmeston Road;
- Compound CO-4H: north of Kilmeston Road;
- Compound CO-4I (A2a): off Riversdown Road (Brockwood Bottom);
- Compound CO-4J: south of A272;
- Compound CO-4K: north of A272; and



- Compound CO-4N: west of A32.

2.6 Working Hours

2.6.1 Working hours will be in accordance with the approved DCO Schedule 2 Part 1, section 14:

'(1) Subject to sub-paragraphs (2), (3) and (4), construction works must only take place between 0800 and 1800 on weekdays (except public and bank holidays) and Saturdays, except in the event of an emergency.

(2) In the event of an emergency, notification of that emergency must be given to the relevant planning authority and the relevant highway authority as soon as reasonably practicable.

(3) The following operations may where necessary, continue or take place on an exceptional basis outside the working hours referred to in sub-paragraph (1)—

(a) trenchless construction techniques which cannot be interrupted;

(b) filling, testing, dewatering and drying;

(c) works required to mitigate delays to the construction of the authorised development due to extreme weather conditions; and

(d) commissioning of the pipeline works.

(4) Nothing in sub-paragraph (1) precludes—

(a) the receipt of oversize deliveries to site and the undertaking of non-intrusive activities;

(b) start-up and shut-down activities up to an hour either side of the core working hours and undertaken in compliance with the CEMP; and

(c) works on a traffic-sensitive street where so directed by the relevant highway authority, pursuant to a permit granted under the permit schemes and following consultation by the relevant highway authority with the relevant planning authority under the terms of such scheme.

(5) In this Requirement—

(a) "emergency" means a situation where, if the relevant action is not taken, there will be adverse health, safety, security or environmental consequences that in the reasonable opinion of the undertaker would outweigh the adverse effects to the public (whether individuals, classes or generally as the case may be) of taking that action; and

(b) "non-intrusive activities" means activities which would not create any discernible light, noise or vibration outside the Order limits.'



- 2.6.2 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 and equipment, setting up of material and 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 project will comply with the ISO 14001:2015 requirements.
- 3.1.2 The Project Leadership will implement management processes and briefings to ensure that the works are carried out in accordance with current legislation and guidance. This will be achieved by application of well-established work processes that apply the recognised BS EN ISO 14001 standard.
- 3.1.3 The Contractor has an Environmental Policy that meets the requirements of ISO 14001 through their internal Business Management System procedures. The policy statement will be displayed on the site notice boards, publicised to all site staff and operatives, and made available to interested parties upon request.

3.2 Project Responsibilities

- 3.2.1 The Principal Contractor will undertake the construction works in accordance with the DCO and its associated documents including this CEMP and its appendices. The relevant aspects of this CEMP will be notified to the workforce at commencement of works within South Downs National Park to highlight the relevant commitments and responsibilities to those undertaking the work.
- 3.2.2 Procedures for monitoring construction processes against the project environmental measures are set out in the sections below. Specific individuals and their roles have been identified, as well as control measures, training procedures, monitoring systems and emergency procedures to be employed throughout the different phases.
- 3.2.3 Overall roles and responsibilities for the project are presented in Table 3.1. These roles may be delivered by multiple people across the project, who are designated that specific responsibility, e.g. ECoW.
- 3.2.4 Additional Suitably Experienced Persons (SEPs) that will be required on site in support roles for the ECoW have been identified for each stage, and their roles defined. 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

Roles	Responsibilities
Environmental Manager	The Environmental Manager will be responsible for the maintenance of all environmental plans and registers, including monitoring that the environmental measures and mitigations are implemented on site and as recorded within the CEMP. They will be the main point of contact for all environmental matters on the project. They will oversee ecological pre-construction surveys. They will also develop good working relationships with key external stakeholders such as the Environment Agency, Natural England and the local authorities.



Roles	Responsibilities
Environmental Clerk of Works	The ECoW will monitor that the works proceed in accordance with relevant environmental Development Consent Order requirements and adhere to the required mitigation measures. The ECoW will be supported as necessary by appropriate specialists (G3, G41).
Permits and Consents Manager	The Permits and Consents Manager will work with the Environmental Manager to draft and submit permits and consents on behalf of the project, track the progress, provide updates and communicate approvals.
Construction Manager	Responsible for the management of the construction of the project.
Works Supervisor	Responsible for delivering the site works in accordance with the requirements of the CEMP and implementing good environmental practices required by the Environmental Manager. They are responsible for managing operatives, plant and their areas of work in accordance with the principles of good environmental practice.
Archaeological contractor	A specialist archaeological contractor will be engaged to deliver archaeological trial trenching across the project. An archaeological watching brief will also be put in place if sensitive archaeological locations are identified.
Design Engineer	The Design Engineer will 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.
Senior HSSE Lead	Responsible for all Health and Safety processes and procedures for the project.
First Aiders	Those identified in site inductions and method statements as people to contact in the event of minor injuries or incidents.
A suitably qualified and experienced person	This person will be expected to have the relevant experience to supervise the relevant aspects of the works, which might include an arboriculturist, land contamination specialist, soil specialist, ecologist, archaeologist.
Land Agent	The Land Agent will provide the main liaison role between the Contractor and the relevant landowner. They will agree preconstruction conditions and sign off completion and handover.
Site Waste Manager	The Site Waste Manager will be responsible for day-to-day waste management and maintaining site waste registers/documentation.
Communications Lead	The Communications Lead will be the point of contact for, and responsible for responding to any communications regarding environmental issues or complaints.

3.3 Site Checks and Reporting

- 3.3.1 Pre-site condition surveys will be undertaken by the contractor as part of the site setup. After construction, post site condition surveys will 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 compliance with the CEMP and other associated plans. The overarching inspections are summarised below in Table 3.2. These will be supplemented with further site checks or inspections set out within the CEMP appendices.



- 3.3.3 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.
- 3.3.4 Site checks and inspections will include checks against compliance with commitments and actions as made by the project.
- 3.3.5 The programme of site inspections will be controlled by the Environmental Manager and implemented by the ECoW, who will 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'*.

Table 3.2: Site Checks

Inspection Type	Purpose	Who	Frequency
Health, Safety & Environment (HSE) Senior Management Inspections	To monitor compliance with project commitments and environmental standards To record adherence to good practice commitments and raise actions where concerns are identified	Senior Management Construction Manager	Monthly
Health, Safety & Environment (HSE) Inspections	To monitor compliance with project commitments and the environmental standards To record adherence to good practice commitments and raise actions where concerns are identified	Senior HSSE Lead Works Supervisor	Weekly
Environmental Inspections	To monitor compliance with project commitments and the environmental standards To record adherence to good practice commitments and raise actions where concerns are identified To check mitigation measures for sensitive features are in place	Environmental Manager Environmental Clerk of Works	Weekly.
Audits (External/Internal)	Formal audit process for internal Management System	External Auditor Environmental Manager	Annual
Site Checks	To ensure that working practices are carried out in accordance with approved methods, standards and good practice commitments	Works Supervisor	Daily visual check in working area.
Environmental Observations	Allows all staff to raise concerns or best practice ideas to safeguard continual improvement and innovation.	All SLP staff and sub-contractors	N/A

- 3.3.6 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.'*

3.4 Information Training and Awareness

3.4.1 In accordance with Commitment G28, all staff and operatives working on the project will undergo a site-specific induction, which includes the following environmental topics:

- ecology: species which are specific to the project, management, mitigation and controls;
- water management: legislation, agreed buffer zones, best practice, control mechanisms. Flood risks and emergency response procedures;
- waste management: legislation, segregation, contamination, best practice;
- nuisance: dust, behaviour, noise, vibration, management and controls;
- working around trees: tree and root protection;
- contaminated land: recognising and dealing with contaminated material;
- spill and emergency response; and
- defined walkways, routes and working areas.

3.4.2 Further training delivered throughout the project will include:

- weekly environmental toolbox talks giving targeted information about site-specific issues;
- spill kit training; and
- asbestos training - all staff.

3.4.3 The operatives delivering the project will specialise in areas of construction, for example site clearance, open cut, trenchless, urban, rural, semi-urban and reinstatement. Therefore, not all training will be appropriate for all staff. Additional training will be given for the following to the relevant operatives:

- site-specific plan locations;
- narrow working methodologies;
- work near notable trees and within root protection areas; and
- working near protected species (G172).

3.5 Emergency Procedures

3.5.1 An 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.

3.6 Reporting

- 3.6.1 The results of inspections will be recorded in the Environmental Log. Findings will be disseminated to the wider construction team as appropriate and additional procedures put in place if required.

3.7 Complaints Procedure

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



4 Consents and Permits

4.1 Consents, Permits and Licences

- 4.1.1 The project will be run in compliance with all relevant legislation, consents and permits in accordance with Commitment G44.
- 4.1.2 The project has set up a detailed consents and permits tracker. The tracker is managed by the Permits and Consents Manager and maintains a full list of permits and consents in place or required for the project including those which have been disappplied through the DCO process. The licences and consents currently identified as being relevant to the project within South Downs National Park are listed in Table 4.1.

Table 4.1: Potential Consents and Permits Relevant to the Project Within South Downs National Park

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.
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 flood risk activities permits are affirmed in the DCO. However, relevant method statements will be submitted to the Environment Agency when working within main river crossings both trenchless and open cut, watercourses within 8m of the trench and works within the floodplain, in or near a watercourse or floodplain, in accordance with Part 4 of the Protective Provisions.
Environmental Permitting Regulations - Discharge to controlled waters	Environment Agency	The project expects to make use of the Environment Agency Regulatory Position Statement where practicable. Environmental permits will be applied for, at locations dewatering for over six months either from a river at a rate of over 20m ³ per day or from groundwater at a rate of over 100m ³ 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 ³ per day. This may apply to some trenchless crossings, some rivers running parallel to the works and open cut areas with high groundwater levels. Where the RPS cannot be applied, the project will apply for an environmental permit for discharge.



Consent Type	Consenting Agency	Expected Locations
Water Industry Act 1991 – Discharge to sewer	Statutory Undertaker	The project will apply for consent, when connecting or dewatering to a sewer.
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).