

Southampton to London Pipeline Project

Construction Environmental Management Plan
(CEMP)

Appendix B: Water Management Plan

Revision No. 1.0

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London Borough of Hounslow





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Acronyms and Abbreviations

| Acronym | Definition |
|---------|------------------------------------------------------------|
| CEMP | Construction Environmental Management Plan |
| CIRIA | Construction Industry Research and Information Association |
| CoCP | Code of Construction Practice |
| DCO | Development Consent Order |
| EA | Environment Agency |
| ECoW | Environmental Clerk of Works |
| ES | Environmental Statement |
| GWDTTE | Groundwater Dependent Terrestrial Ecosystem |
| GWSA | Groundwater study area |
| HDPE | High-density polyethylene |
| LEMP | Landscape and Ecological Management Plan |
| LLFA | Lead Local Flood Authority |
| PWS | Private water supply |
| RoFSW | Risk of Flooding from Surface Water |
| WMP | Water Management Plan |



1 Introduction

1.1 Overview of the Project

- 1.1.1 Esso Petroleum Company, Limited (Esso) has been granted a Development Consent Order 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 1 stage, based on geographical area. Of the 97km pipeline route, 106m is through the London Borough of Hounslow between (507 005E, 173 347N) and (507 126E, 173 380N), all contained within Esso's West London Terminal storage facility. This is shown on Sheet 13 of the Stages of 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 Construction Environmental Management Plan (CEMP) pursuant to Requirement 6 of the DCO.

1.2 Purpose of the Water Management Plan

- 1.2.1 This Water Management Plan (WMP) for London Borough of Hounslow has been produced as Appendix B to the CEMP. The CEMP and appendices have been produced prior to construction and submitted for approval by London Borough of Hounslow in accordance with Requirement 6 of the DCO, after consultation with the Environment Agency (EA). The control measures set out in the WMP will govern the methodologies when undertaking the construction of the project.
- 1.2.2 The WMP should be read alongside the generic methodology for watercourse crossings which can be found within the Section 2.9 of the Code of Construction Practice (CoCP). This contains details about how watercourses would be crossed during construction and how they would be reinstated. It should also be read alongside the Landscape and Ecological Management Plan (LEMP) which will contain further



details about how watercourses would be reinstated, including vegetation type. There are no water course crossings within the London Borough of Hounslow.

- 1.2.3 The WMP should also be read alongside the Emergency Action Plan (CEMP Appendix A) which contains information about the processes and measures that would occur during an emergency such as an extreme flood event or a significant pollution incident.
- 1.2.4 Crossing watercourses is an activity (a 'flood risk activity') under the Environmental Permitting (England and Wales) Regulations 2016, which requires a permit. Likewise, the obstruction of ordinary watercourses is controlled under the Land Drainage Act 1991 and requires an 'ordinary watercourse consent'. In accordance with Article 36 of the DCO, an environmental permit for flood risk activities or an ordinary watercourse consent will not be required as Esso is instead required to comply with the protective provisions agreed with the EA and the LLFAs as set out in Schedule 9 Parts 4 and 5 of the DCO.
- 1.2.5 Works within watercourses will comply with the protective provisions as well as the working methodology detailed in Section 2.9 of the CoCP, the LEMP and in line with the relevant good practice measures included within this WMP.
- 1.2.6 As per commitments G44 and G123 the project would take place in compliance with all consents and permits. Appropriate procedures would be followed for surrendering permits, consents and licences following the end of the construction phase, which will be managed by the Permits and Consents Manager.

1.3 Aims and Objectives

- 1.3.1 The overarching aim of the WMP is to set out the good practice measures that would be employed to reduce impacts on water during the construction of the pipeline and to maintain positive working relationships with local communities, the relevant planning authorities, the EA and the LLFA.
- 1.3.2 Water includes surface water systems such as rivers and watercourses, and groundwater resources such as aquifers. The WMP covers measures in relation to flood risk, water quality (including pollution prevention) and geomorphology (and other considerations in line with the Water Framework Directive).
- 1.3.3 The objectives of the WMP are to define:
- the existing good practice measures in relation to water;
 - the processes and procedures in place to control the discharge of water;
 - how water will be managed including monitoring and sediment control; and
 - how the project will monitor water usage and reduce use of potable water.
- 1.3.4 The WMP relates only to the construction of the project, as there are no significant effects during operation.

1.4 Roles and Responsibilities

1.4.1 Overall roles and responsibilities for the project are presented in the CEMP. The main roles and responsibilities specific to the WMP are set out in Table 1.1 along with the specification for the roles where applicable.

Table 1.1: Roles and Responsibilities

| Roles and specification | 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 also develop good working relationships with key external stakeholders such as the EA, Natural England and the local authorities. |
| Environmental Clerk of Works (ECoW) | The ECoW will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required mitigation measures. The ECoW will be supported as necessary by appropriate specialists (G3, G41). |
| 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. |
| Permits and Consent 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. |

1.5 Structure of the Water Management Plan

1.5.1 The WMP includes:

- Section 2: This contains a summary of the geographical context based on the details set out in Environmental Statement (ES) Chapter 8 (**Application Document [APP-048](#)**) and associated appendices (**Application Documents [APP-102](#) to [APP-107](#)**);
- Section 3: This includes good practice commitments and methods to reduce impacts to water during construction’;
- Section 4: This outlines the commitments relating to specific aspects of the water environment: abstractions, dewatering and discharges, pollution and erosion prevention measures, and flood-risk reduction; and
- Section 5: This outlines the site checks and reporting that would be undertaken in respect of water.

2 Geographical Context

2.1 Geographical Context and Features

Surface Water Features

- 2.1.1 There are no main rivers or ordinary watercourses crossed by the Order Limits within the London Borough of Hounslow.
- 2.1.2 The Order Limits within the London Borough of Hounslow are not within an area at Risk of Flooding from Surface Water (RoFSW).
- 2.1.3 The Order Limits within the London Borough of Hounslow are not within a Flood Zones 2 or 3.
- 2.1.4 Further details on the baseline surface water environment can be found within ES Chapter 8 (**Application Document [APP-048](#)**), ES Appendix 8.6 (**Application Document [APP-107](#)**) and the Flood Risk Assessment (**Application Document [APP-134](#)**).

Groundwater Features

- 2.1.5 ES Chapter 8 (**Application Document [APP-048](#)**) identified four groundwater study areas (GWSA) which are based on underlying geology and the associated groundwater environment:
- GWSA-D (Chertsey South to Esso's West London Terminal Storage Facility) – This area passes over Principal aquifers associated with the Kempton Park Gravel Member and Shepperton Gravel Member. There are Secondary A aquifers associated with the Bagshot Formation and Claygate Member. Several flooded gravel pits are present within GWSA-D, indicating the groundwater is at a relatively shallow depth.
 - There are no areas impacted by the project that are identified as Groundwater Dependent Terrestrial Ecosystems (GWDTEs) within GWSA-D in the London Borough of Hounslow
 - There are no Source Protection Zones impacted within the London Borough of Hounslow.
- 2.1.6 Further details on the baseline groundwater environment can be found within ES Chapter 8 (**Application Document [APP-048](#)**) and Appendix 8.3 (**Application Document [APP-104](#)**).

3 Water Management Plan

3.1 Introduction

3.1.1 A generic construction methodology has been developed for watercourses and can be found in Section 2.9 of the CoCP. This sets out the methodology for open cut watercourse crossings and installation of vehicle crossing points. The final detailed methodology will be agreed with the LLFA or EA as appropriate.

3.2 Good Practice Measures

3.2.1 Esso has made a number of good practice commitments which will reduce impacts on the water environment. The commitments are indicated by a reference number, for example (G11).

3.2.2 The purpose of the WMP is to provide information as to how and when the commitments made within the CoCP will be applied to the various aspects of the water environment. Many of the measures will apply to more than one aspect, such as the requirement to create buffer zones alongside watercourses which would reduce the risk of sediment entering the watercourse and also reduce the risk of flooding to the works areas. The project commitments that relate to a number of aspects of the water environment are listed in Table 3.1. Commitments relating to a specific aspect, for example managing flood risk, are contained within the following sections.

Table 3.1: Project Commitments Relevant to the Whole Water Environment

| Commitment Number | Commitment |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| O1 | Commitment to only utilise a 10m width when crossing through boundaries between fields where these include hedgerows, trees or watercourses. |
| O4 | Trenchless crossing technology to be used for crossings of waterways over 30m wide. |
| G12 | There would be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of emergency). |
| G28 | Construction workers would undergo training to increase their awareness of environmental issues. Topics would include but not be limited to... location and protection of sensitive environmental sites and features; adherence to environmental buffer zones; and flood risk response actions. |
| G39 | Appropriate buffer zones would be established within Order Limits adjacent to identified watercourses. |
| G122 | For open cut watercourse crossings and installation of vehicle crossing points, mitigation measures would include to: <ul style="list-style-type: none"> only use a 10m working width for open cut crossings of a main or ordinary watercourse whilst still ensuring safe working; install a pollution boom downstream of the works; use and maintain temporary lagoons, tanks, bunds, silt fences or silt screens as required; have spill kits and straw bales readily available at all crossing points for downstream emergency use in the event of a pollution incident; place all static plant such as pumps in appropriately sized spill trays; prevent re-fuelling of any plant or vehicle within 15m of a watercourse; inspect all plant prior to work adjacent to watercourses for leaks of fuel or hydraulic fluids; and |



| Commitment Number | Commitment |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> reinstatement of the riparian vegetation and natural bed of the watercourse using the material removed when appropriate on completion of the works and compact as necessary. If additional material is required, appropriately sized material of similar composition would be used. |
| G130 | <p>The CEMP would follow the principles set out in the Outline CEMP and would set out the water mitigation and management measures and where they would need to be used. These measures would include, but not be restricted to, the following:</p> <ul style="list-style-type: none"> details of when dewatering would be likely; measures to segregate construction site runoff from natural catchment runoff; details of measures to attenuate runoff rates before discharging at controlled rates to receiving watercourses; design of any holding or settlement lagoons or other treatment system required prior to discharge to the environment; details of mitigation measures for all work or compound areas located within flood risk areas; where construction activities would be located, preferably outside of the floodplain; and details of any water abstraction and discharge points relating to the works. |

3.2.3 Commitments O1 and O4 form part of the guiding principles set out at the inception of the project and have been incorporated into the design and construction methodologies. Commitments G12 and G122 relate to construction measures designed to protect the surface water environment from sedimentation, erosion, pollution effects and increasing flood risk.

3.3 Construction Programme

3.3.1 It is anticipated that works to install the pipeline will start in 2021 and be completed in 2023. Within London Borough of Hounslow the programme is anticipated to follow the phasing, shown in The Stages of the Authorised Development.

3.4 Pre-construction Commitments

3.4.1 Licences and Consents: Several activities and measures would take place prior to the main construction works commencing. These include applying for consents and licences (or approvals as per the DCO protective provisions for flood risk activities) prior to the works to which those licences apply, commencing. The contractor(s) will comply with all relevant consent conditions or DCO provisions regarding flood risk activities, dewatering and other discharge activities. This would be with particular regard to volumes and discharge rates and would include discharges to land, waterbodies or third-party drains/sewers (G128).

3.4.2 The project Permits and Consents Manager will manage the consents process, with input from the construction team. A number of expected consent requirements at various locations of the project, such as at trenchless crossing locations and at compounds, have been identified. A list of these within London Borough of Hounslow is provided in Table 3.2. Note this list is provisional and highlights locations where there may be a potential requirement. The full detail of the proposed licences and consents will require review and application ahead of mobilisation when specific site requirements can be confirmed.

Table 3.2: Expected Water Consent Requirements and Locations

| Location | Reference | Potential Water Consent/Permit Requirement | Consent Granting Body (CGB) |
|----------------------------------|-----------|-----------------------------------------------------------|-----------------------------|
| Within Esso West London Terminal | Various | DCO Article 18 - Discharge of Water with consent of owner | Esso |

3.5 Site Planning and Set Up

3.5.1 During site set up the construction site layout will be planned to control potential risks to surface water, groundwater or flooding. This will include identifying the buffer zones at watercourses outside the 10m working width (O1) to a distance from the bank appropriate to the location (G39). The buffer zones will be dependent on factors such as avoiding areas of floodplain and sensitive bank or instream features. These buffer zones may be delineated with silt fencing to provide further protection from potential site runoff. Alternatively, if runoff risk is low, the locations will be demarcated with fencing, such as pedestrian barrier or heras type barrier.

Construction Compounds

3.5.2 There are no construction compounds within London Borough of Hounslow, however project wide, temporary construction compounds will take into account the following commitments:

- G184: Stockpiles would not be located within 10m of any main rivers or ordinary watercourse crossings; and
- W2: Screening and fencing within logistics hubs and construction compounds would be designed to reduce the impedance of flood water. This would be subject to any commitments regarding great crested newts.

3.5.3 Good practice measures G15, G16, G117, G119, G121, G142 and G195 in relation to pollution control, storage of fuels and hazardous materials will be adhered to (see Table 4.2). Compounds will have plans showing surrounding sensitive areas, areas sensitive to flooding, drainage layout, location of substances considered under the Control of Substances Hazardous to Health Regulations 2002 and fuel storage and the location of any spill kits. Contact details will be provided for the relevant authorities, such as the EA, the persons responsible on the construction site and contacts of a spill response company which can be contacted at short notice for an immediate response.

3.5.4 At compounds and across all areas of the site, fuel and oil will be stored in accordance with the Control of Pollution (Oil Storage) (England) Regulations 2001.

3.5.5 Any site drainage to manage surface water that may be required during the mobilisation of the compounds, along with connections for foul, will be undertaken in line with agreement from the relevant authority, as per the consents summary Table 3.2.



- 3.5.6 Connection to mains water supply may be used, but this will depend on the logistics of the connection and longevity of the relevant compound. Many of the compounds will use water deliveries to supply potable water to welfare facilities and tanker away foul water as waste.
- 3.5.7 Compounds will be provided with good practice measures for water conservation including the use of water-efficient taps within welfare, waterless toilet facilities, assessment of whether water can be reused, and regular checks to hoses for water leaks.

Trenchless Crossings

- 3.5.8 There are no trenchless crossings within London Borough of Hounslow, however project wide, works at trenchless crossings will also follow the pollution control measures with regard to fuel and storage of hazardous substances as detailed in Sections 3.5.3 and 3.5.4. Commitments O4 and W13 will be adhered to. If shafts are required, prior to their excavation, groundwater levels will be reviewed and controls such as sheet pile installation to control water ingress, and dewatering requirements will be planned. Any consents required to control the dewatering operations will be applied for prior to commencing works as indicated in Table 3.2. Good practice measures identified in Table 4.2 with regard to silt management will be adhered to in these locations.
- 3.5.9 Bentonite and drilling fluids will be supplied to the work site using a specifically designed unit manufactured to mix and supply the fluid via pumps. Any excess muds will be contained within purpose-made containers or pits which are lined with high-density polyethylene (HDPE) liner. This will contain any drilling fluid or mud within the pit and allow removal as waste, in line with the Site Waste Management Plan. Alternatively, where volumes and logistics allow, a drilling fluid recycling unit will allow re-use of the material.
- 3.5.10 TC001 pits will be sited adjacent to an area at Risk of Flooding from Surface Water (RoFSW) and, therefore, the site teams will be prepared for surface water flooding and supplied with the required sediment control equipment.

Open Cut Working

- 3.5.11 In accordance with G130:
- The design of any settlement or other treatment system required prior to discharge to the environment, is described in Section 4 and Table 4.4.
 - Construction activities are largely located outside of Flood Zone 3 within London Borough of Hounslow.
 - Details of water abstraction and discharge points relating to the works are provided in Table 3.2
- 3.5.12 Commitment G122 details how open cut works will be managed through watercourses to control pollution. This involves setting up site to allow capture of runoff and potential pollutants to prevent their entry into the watercourse. In addition, measures are



presented to mitigate a spill event, such as the positioning of spill kits, booms and other containment devices downstream of the crossing.

- 3.5.13 Should excavations go deeper than the 4m LoD for open cut construction works, the EA will be consulted and an assessment undertaken to confirm that the extension does not give rise to any new or materially different environmental effects to those assessed in the environmental statement

Concrete Wash Water

- 3.5.14 The activities that will require concrete to be used, in temporary and permanent works, include but will not be limited to:
- creation of new access points;
 - installation of temporary works shaft bases; and
 - utility protections.
- 3.5.15 Concrete washout from concreting operations will be managed so that no concrete runoff or wash water enters the local drainage systems or watercourses. Methods such as dry brushing of the mixer chutes, to avoid washing out on site, or the use of roadside washout systems and containers to provide designated sealed washout locations, will be provided. The specific method used will be selected based on the level of risk in the area and extent of concrete being poured. Where possible and if there is no risk to the environment or human health, wash water may be used for construction processes such as dust suppression in line with EA Low Risk Waste Position 16 (Reusing wash waters and treating cement and silt washings at construction sites: LRWP 16).

Discharge and Abstraction Locations

- 3.5.16 Locations of water sources for general water consumption in the use of site cabins, for general cleaning and dust suppression will likely be via mains supply or tankered delivery. Hydrostatic testing of the pipeline prior to commissioning may also use mains water supplies; hydrant licences may be applied for from the water undertaker, to provide access to local mains abstraction points close to the works site.
- 3.5.17 Discharge locations for dewatering activities will be identified on site, depending on the locality and requirements of the specific discharge, especially during the open cut works, and approved as appropriate.
- 3.5.18 As part of the pre-construction activities, there will also be negotiations with landowners to identify active private water supplies (PWS) within the Order Limits (G144). To date no PWS have been identified within the Order Limits within Eastleigh Borough. Should supplies be identified, discussions and agreements including protection arrangements and/or provisions of alternative water supplies will be put in place. The following measures in accordance with commitment W12 will be followed:
- In the event of a landowner or tenant complaining that installation activities have affected their PWS, an initial response would be provided within 24 hours.
 - Where the installation works have affected a PWS, an alternative water supply would be provided, as appropriate.



- 3.5.19 In the event of a significant spill during construction, that cannot be immediately contained, managed and cleaned on site:
- all landowners/tenants would be contacted within 24 hours, within 250m of the spill, to determine if there are any PWSs that might be affected;
 - an assessment of the likelihood of groundwater contamination supplying identified PWSs would be undertaken;
 - where requested by the relevant landowner, monitoring of well water would be undertaken for a determined period of time, taking into account pollution travel time in groundwater, to determine whether pollution has occurred; and
 - where a PWS is affected, an alternative water supply would be provided, as appropriate.

3.6 Training for Construction Staff

- 3.6.1 As detailed in Section 3.4 of the CEMP, all staff and operatives will undergo a site induction which will incorporate water management as a specific topic. Targeted training consisting of toolbox talks and briefings will include topics such as water management, flood risk, dewatering and silt management.

4 Specific Aspects of the Water Environment

4.1 Introduction

4.1.1 This section outlines the commitments and actions relevant to the different aspects of the water environment. The good practice commitments are outlined at the start of each section and then further information is presented about how these would be implemented. It is split into the following three aspects:

- abstractions, dewatering and discharges;
- pollution and erosion prevention measures; and
- flood risk reduction.

4.2 Abstractions, Dewatering and Discharges

4.2.1 This section of the WMP sets out any requirements for abstraction, dewatering and discharges. The project commitments relevant to abstractions, dewatering and discharges are presented in Table 4.1.

Table 4.1: Project Commitments Relevant to Abstractions, Dewatering and Discharges

| Commitment Number | Commitment |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| O7 | Where required, water stops (or “stanks”) would be installed at intervals through the pipe bedding and side fill. |
| G118 | The detailed design for Horizontal Directional Drilling would include depth and profile and consider methods to reduce the risk of groundwater breakout during Horizontal Directional Drilling. |
| G128 | The contractor(s) would comply with all relevant consent conditions or DCO provisions regarding dewatering and other discharge activities. This would particularly be with regard to volumes and discharge rates and would include discharges to land, waterbodies or third-party drains/sewers. |
| G132 | The contractor(s) would ensure that the time the trench is open in the vicinity of certain features would only be as long as necessary for the installation of the pipeline. The required dewatering of the trench would be undertaken only as and when necessary to enable safe working and preparation for pipe installation. |
| G134 | Temporary stanks would be installed within the trench prior to undertaking dewatering/drainage activities, to prevent migration of water within the trench. |
| G135 | Where localised water abstraction is required, assessments would be carried out to investigate impact. Appropriate working and suitable mitigation would be implemented. |
| G138 | Water levels would be monitored immediately prior to and as dewatering takes place. This would be in the potentially affected abstraction or watercourse as appropriate. |
| G143 | The quality of water generated by dewatering would be tested prior to discharge. |
| G144 | As part of negotiations with landowners within the Order Limits which are affected by the project, active private water supplies (PWSs) would be identified with the landowner. Appropriate mitigation would be considered during construction. |
| G199 | Specific areas in the vicinity of GWDTEs would be identified where increased frequency of stanks would be required to safeguard sensitive habitats which depend on groundwater. |
| W11 | Dewatering would be limited in areas in the vicinity of GWDTEs where abstraction/drainage of shallow groundwater may lead to a fall in groundwater levels or adversely affect surface water quality. |
| W12 | For private water supplies (PWSs) the following would be put in place: <ul style="list-style-type: none"> • In the event of a landowner or tenant complaining that installation activities have affected their PWS, an initial response would be provided within 24 hours. |



| Commitment Number | Commitment |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> • Where the installation works have affected a PWS, an alternative water supply would be provided, as appropriate. • In the event of a significant spill during construction: <ul style="list-style-type: none"> ➢ all landowners/tenants would be contacted within 24 hours, within 250m of the spill, to determine if there are any PWSs that might be affected; ➢ an assessment of the likelihood of groundwater contamination supplying identified PWSs would be undertaken; ➢ where requested by the relevant landowner, monitoring of well water would be undertaken for a determined period of time, taking into account pollution travel time in groundwater, to determine whether pollution has occurred; and • where a PWS is affected, an alternative water supply would be provided, as appropriate. |

4.2.2 At the present time, dewatering is anticipated:

- in areas where groundwater levels mean that the trench may contain water during excavation;
- following periods of heavy rainfall; and
- during shaft construction at trenchless crossings.

4.2.3 Dewatering may take place to surface water drain or sewer. Consent will be required from the sewerage undertaker for discharge to sewer or surface water manhole. As per G128 and G143, conditions on the quality and flow will be agreed and monitored.

4.2.4 Where dewatering activities are anticipated directly to surface water, such as ditches or watercourses, the project expects to use the EA regulatory position statement guidance with respect to temporary dewatering from excavations to surface water. The project will also apply the relevant exemptions set out in part 2 of the Water Abstraction and Impounding (Exemptions) Regulations 2017, for example small scale dewatering in the course of building and engineering works. As such, no permit requirement is anticipated for a short-term, temporary discharge of uncontaminated water which is wholly or mainly from rainwater, from an excavation to surface water, for example where rainwater has accumulated within the trench. However, the measures detailed in Section 4.2.7 and Table 4.3 to control silt will be implemented.

4.2.5 During dewatering in areas confirmed during ground investigation as not being contaminated, as a minimum visual monitoring will be undertaken for suspended solids and signs of hydrocarbons (oily sheens). Where suspended solids or visual hydrocarbon are present in the water it will be contained and if the suspended solids or visual hydrocarbon cannot be removed, through filtration, settlement or absorbents locally on site, further permitting would be sought or it will be disposed of in accordance with the SWMP.

4.2.6 When dewatering in line with above EA guidance, commitments G12, G128, G132, G135, G138, G143 and G199 will be implemented. Dewatering methods would be determined based on the surrounding environment and amount of water needing to be discharged in line with one of the following measures:

- 1) Pumping to Sewer with consent from the sewage undertaker



2) Pumping to an area of open vegetated ground. Water must be uncontaminated, and silt will be removed using a settlement tank, straw bales or a geotextile membrane, dewatering filter bag or similar (see Table 4.3).

3) Pumping into an existing surface water channel or ditch with consideration to the final discharge point. Water will need silt removal as per 1) above.

4) Where this cannot be achieved or the water is contaminated, it will be removed from site by vacuum tanker. This will be carried out in accordance with the SWMP.

- 4.2.7 Where dewatering is required for over three months either from surface water at a rate of over 20m³ per day or from groundwater at a rate of over 100m³ per day (reduced to 50m³, should the dewatering be within 500m of a conservation site or within 250m of a spring, well or borehole used to supply water) then permits and consents would be applied for as necessary, following consultation with the EA, as the EA guidance cannot be applied. This may apply to some trenchless crossings, some rivers running parallel to the works and open cut areas with high groundwater levels.
- 4.2.8 When dewatering under a permit, all conditions on flow rates and quality will be complied with and monitored as per G128 and G143.
- 4.2.9 Dewatering of watercourses for the purposes of open cut crossings is not covered in this section as it is not expected to be required. Fluming or similar techniques will be used to maintain water flow during installation. Section 2.9 of the CoCP contains further details about how watercourses would be crossed during construction.
- 4.2.10 Commitments O7 and G134 relate to the installation of water stops (or stanks) along the route which are designed to reduce the flow of groundwater along the pipeline once it has been backfilled. Such locations could include where the trench crosses a GWDTE, in areas expected to have shallow groundwater or in the vicinity of watercourse crossing locations. Stanks will be installed where required and the spacing of them will be dictated by prevailing ground conditions and water table. This would take into account any GWDTE areas, where the frequency of stanks will be increased as per G199. Commitment G118 commits the project to incorporate groundwater control into the detailed design of Horizontal Directional Drilling thus reducing the reliance on further measures during construction. See Section 3.5.8.
- 4.2.11 Commitment G199 and W11 are very specific measures designed to limit the effects of alterations in groundwater levels within GWDTEs such as Ford Lake Valley at TC001.
- 4.2.12 Commitments G12, G128, G132, G135, G138, G143 and G199 are all general good practice measures to be followed during construction and will be implemented. There are certain features (as mentioned in commitment G132) that would be particularly vulnerable to changes in groundwater levels such as:
- GWDTEs;
 - shallow groundwater abstractions;
 - watercourses running parallel to the pipeline; and
 - unconfined Chalk principal aquifers.



4.2.13 Commitments G144 and W12 relate to the safeguarding of PWSs from possible changes in groundwater during dewatering activities. In the case of mitigation being required, measures that could be implemented to meet the commitments could include the installation of temporary sheet piling or similar barriers to reduce the flow of groundwater.

4.3 Pollution and Erosion Prevention Measures

4.3.1 This section of the WMP sets out any requirements for pollution and erosion prevention. As pollution prevention and erosion control measures are often the same or very similar, the Erosion and Sediment Control Plan, described as Appendix B in the Outline CEMP submitted at application, is incorporated into this section of the WMP. The project commitments relevant to pollution and erosion prevention are presented in Table 4.2.

Table 4.2: Project Commitments Relevant to Pollution and Erosion Prevention Measures

| Commitment Number | Commitment |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| G11 | Runoff across the site would be controlled by the use of a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. |
| G12 | There would be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of emergency). |
| G15 | Wheel washing would be provided at all logistics hubs and large compound access points on to the highway. An adequate supply of water would be made available at these locations at all times. |
| G16 | Compound access points to the public highway would be constructed with temporary hard surfacing. |
| G20 | Water assisted road cleaners would be deployed on public roads where necessary to prevent excessive dust or mud deposits. |
| G117 | Wash down of vehicles and equipment would take place in designated areas within construction compounds. Wash water would be prevented from passing untreated into watercourses and groundwater. Appropriate measures would include use of sediment traps. |
| G119 | Potentially hazardous materials used during construction would be safely and securely stored including use of secondary containment where appropriate. |
| G121 | All refuelling, oiling and greasing of construction plant and equipment, would take place above drip trays and also away from drains as far as is reasonably practicable. Vehicles and plant would not be left unattended during refuelling. Appropriate spill kits would be made easily accessible for these activities. |
| G122 | For open cut watercourse crossings and installation of vehicle crossing points, mitigation measures would include to: <ul style="list-style-type: none"> only use a 10m working width for open cut crossings of a main or ordinary watercourse whilst still ensuring safe working; install a pollution boom downstream of the works; use and maintain temporary lagoons, tanks, bunds, silt fences or silt screens as required; have spill kits and straw bales readily available at all crossing points for downstream emergency use in the event of a pollution incident; place all static plant such as pumps in appropriately sized spill trays; prevent refuelling of any plant or vehicle within 15m of a watercourse; inspect all plant prior to work adjacent to watercourses for leaks of fuel or hydraulic fluids; and reinstate the riparian vegetation and natural bed of the watercourse using the material removed when appropriate on completion of the works and compact as necessary. If |



| Commitment Number | Commitment |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | additional material is required, appropriately sized material of similar composition would be used. |
| G142 | Fuels, oils and chemicals would be stored responsibly, away from sensitive water receptors. They would be stored >15m from watercourses, ponds and GWDTE. |
| G183 | Natural substrate would be provided through temporary watercourse crossings box culverts. |
| G186 | Where appropriate, cross-fall would be installed on access and haul roads to direct runoff away from the pipeline trench. Runoff would be collected at the side of the haul road and discharged to ground if relevant or to an appropriate nearby watercourse or sewer in accordance with the provisions of the DCO. |
| G195 | Stored flammable liquids such as diesel would be protected either by double-walled tanks or stored in a bunded area with a capacity of 110% of the maximum stored volume. Spill kits would be located nearby. |

- 4.3.2 An Emergency Action Plan is included in CEMP Appendix A. This sets out procedures to follow should a pollution event occur. The measures set in the Emergency Action Plan will not be reiterated in the final WMP which deals with prevention.
- 4.3.3 During construction, each work activity method statement will set out how pollution and sediment risk would be managed, including proactive actions and measures to control pollution risks. This could be either directly from the construction works or due to external factors such as extreme weather. Measures will include appropriate storage and handling of fuels and other substances hazardous to the environment in accordance with commitment G8.
- 4.3.4 Construction method statements will take into account the requirements of the EA and LLFAs as per the protective provisions of the DCO. Works will consider the advice set out in the following guidance documents:
- Former guidance for Pollution Prevention , various publication dates (accessed via <http://www.netregs.gov.uk>);
 - C532 Control of Water Pollution from Construction Sites (Construction Industry Research and Information Association (CIRIA), 2001); and
 - C650 Environmental Good Practice on Site (CIRIA, 2005).
- 4.3.5 While mobilising works areas, various measures such as those described in commitments G11 and G122 will be implemented to manage site surface water, divert clean surface water away from the work site and to prevent silt pollution and erosion of exposed soils. Examples of these types of measures are summarised in Table 4.3 and will be selected for use as necessary dependent on the local conditions, such as level of risk from flooding, weather conditions and surrounding topography.

Table 4.3: Surface Water Control and Silt and Erosion Management Measures

| Clean Water Diversion, Silt and Erosion Prevention Measures | Purpose |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cut-off or interception drains | Collection channels constructed to divert runoff water from entering disturbed surfaces. Generally constructed above cuts or fills and in natural, undisturbed ground on the up-side slope of the working area in steep areas. |



| Clean Water Diversion, Silt and Erosion Prevention Measures | Purpose |
|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Temporary site drains | Control and collection of runoff water from site into temporary drainage channel using the various silt control measures listed below to maintain the water free of silt. |
| Culverts/flume pipes – cross track drainage | Structures made from pipes (concrete or steel) designed to maintain continuous flow of clean water through the worksite during construction. |
| Diversion berms | Used to divert clean water runoff to a well-vegetated area by constructing a small berm of compacted earth from material excavated from a shallow trench located on the upslope. Berms are constructed at set intervals from the top of the slope down and with enough fall to allow the water to slowly flow outside of the berm to a well vegetated area. |
| Protection of exposed soils | To reduce the risk of silt being mobilised by erosion caused during rainfall events. Stockpiles should be compacted and graded to reduce rainwater infiltration. If they are in a sensitive area, e.g. near a watercourse, consideration should be given to covering over, e.g. with tarp or geotextile, to prevent erosion. |
| Check dams and sumps | Installed within drainage ditches and cut-off trenches to slow down the flow of water, preventing erosion and allowing silt to settle out. Check dams can be made from a variety of materials, including silt fences, stone, straw bales, sandbags, soil or clay. Sumps behind the dam allow for emptying of silt. |
| Small settlement area/ attenuation ponds | A small swale or depression within the site ditch to intercept and retain silty water before it leaves site, to give it a chance to settle out and to protect sensitive sites and watercourses below the site from silt pollution. These may be provided on the line of cut-off trenches or form part of temporary site drainage, to control flow and silt. |
| Filter dams | Installed to slow down the flow of water and provide some filtration within drainage ditches. Involves provision of gravel within the channel/ditch lined with geotextile. The geotextile can also be 'lipped' at intervals along the length of the stone, to provide an additional barrier and filtration system for the water flowing through the gravel. |
| Silt fencing | A geotextile barrier installed on stakes and buried into the ground to provide a barrier to protect sensitive receptors such as adjacent watercourses. The fence captures and slows the flow of silty water, allowing the fence to filter out the silt particles. |
| Buffer strips | Retained areas of vegetation between the work site and sensitive receptors, to allow natural drainage and protection. These will be demarcated on site. |
| Silt bags and filters | For water to be pumped into, during dewatering operations, to provide filtration of silt particles. They can also be used to accept a gravity feed from a settlement lagoon or drainage pipe. |
| Settlement tanks | Use of purpose-made tanks such as Siltbuster, that allow silt-laden water to be pumped through at controlled rates, to allow settlement and discharge of clear water downstream. |
| Flocculants and coagulants | A chemical solution for very fine silt particles that will not settle out by gravity alone. Their use will require agreement with the EA. |

4.3.6 A construction methodology for watercourses has been produced and is presented within Section 2.9 of the CoCP. This outlines how works will be undertaken at watercourse crossings where open cut methods are proposed. It also sets out how



works will be managed to reduce the risk of erosion and sediment mobilisation and how watercourses, in general, would be reinstated.

- 4.3.7 Commitments G11, G12 and G186 will be implemented to control water flow and discharge across all construction areas. The methods used to control flows, scour and erosion will be decided by the contractor, to be the most appropriate for the location, with reference to any relevant licence conditions. Many of these measures will be installed during the initial set up of the construction area, such as the header drains. However, additional measures may also be used during construction for example at times of heavy rainfall. Commitment G186 is important to prevent runoff entering the pipeline trench. Without this commitment, water and associated sediment could potentially flow unimpeded for large distances. Table 4.3 provides further description of the measures that can be used to manage water flow across the construction site.
- 4.3.8 Commitment G122 affords particular protection to watercourses during open cut crossings. During open cut crossing, there is potential for runoff from the main construction strip, riverbanks and the trench itself, and pollutants from on-site activities to enter the watercourse. The measures outlined within commitment G122 aim to capture runoff and pollutants to prevent their entry into the watercourse. In addition, measures are presented to mitigate a spill event such as the positioning of spill kits, booms and other containment devices downstream of the crossing.
- 4.3.9 Works at watercourses will be checked prior to commencement by the ECoW for presence of invasive species. If identified they will be removed in line with the relevant guidance and under supervision of the ECoW. Equipment will be cleaned prior to works starting and before removal from site to prevent transfer of invasive species between sites.
- 4.3.10 As part of good site practices, vehicles will be maintained and inspected on a regular basis to prevent and identify any leaks, and refuelling undertaken at designated locations. This will limit any drips and spills from vehicles throughout the project.
- 4.3.11 Commitments G15, G16, G20 and G117 are all measures to reduce the effects of vehicles transporting mud and dust from the construction areas and compounds to where it could enter watercourses. Designated vehicle washing areas will be designed to prevent the release of sediment and other pollutants. Static wheel washers are likely to be used at the larger compounds, but in areas with more limited space, pressure washers could be used, dependent on the ground conditions and whether there is potential to transport mud or dust onto the road. Hard surfacing will be used at compound access points onto the public highway, to prevent muddy areas developing in areas of heavy construction traffic, and road cleaners used to reduce the build-up of mud on nearby roads.
- 4.3.12 Further measures are set out within the Soil Management Plan and the Dust Management Plan to avoid the creation of airborne dust or runoff from stockpiles to reduce the risk of silt and soil entering watercourses:
- Soil Management Plan: Outlines the methods for managing earthworks and exposed areas or soil stockpiles to prevent windborne dust, which could end up in watercourses. For example, covering, seeding or using water suppression and considering weather conditions when programming the work.



- Dust Management Plan: Outlines methods for wheel washing and road cleaning to reduce the risk of dust.

4.3.13 Commitments G119, G121, G142 and G195 all relate to the safe storage and use of potentially hazardous materials and chemicals such as fuel, oils and lubricants. Drip trays and containment measures will be used extensively across the project to capture potential leakages. Storage of flammable liquids will be within double-walled tanks or surrounded by a containment area of 110% capacity which would capture any spillage/leakage in the event of a breach of containment. Where applicable, all storage will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001. Operations such as refuelling will be located away from potentially sensitive features.

4.4 Flood Risk Reduction

4.4.1 This section of the WMP sets out requirements for flood risk management. The project commitments relevant to flood risk are presented in Table 4.4.

Table 4.4: Project Commitments Relevant to Flood Risk

| Commitment Number | Commitment |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| G11 | Runoff across the site would be controlled by the use of a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. |
| G12 | There would be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of emergency). |
| G123 | All works within or adjacent to watercourses would be carried out in accordance with the requirements of permits and licences agreed with either the Environment Agency or relevant Lead Local Flood Authority or in accordance with the provisions of the DCO. |
| G124 | All construction activities within Flood Zone 3 would be undertaken in a manner that reduces any significant increase in flood risk. This may include providing suitable breaks within spoil piles. |
| G125 | With the exception of the Thames floodplain, all construction compounds and logistics hubs would be located outside of Flood Zone 3. |
| G126 | Where new or additional surfacing is required on any access tracks and compound areas, these would be permeable surfaces where ground conditions allow. |
| G127 | The contractor(s) would subscribe to the Environment Agency's Floodline service which provides advance warning of potential local flooding events and subscribe to the Met Office's Weather Warnings email alerts system and any other relevant flood warning information. The contractor(s) would implement a suitable flood risk action plan which would include appropriate evacuation procedures should a flood occur or be forecast. |
| G130 | The CEMP would follow the principles set out in the Outline CEMP and would set out the water mitigation and management measures and where they would need to be used. These measures would include, but not be restricted to, the following: <ul style="list-style-type: none"> • details of when dewatering would be likely; • measures to segregate construction site runoff from natural catchment runoff; • details of measures to attenuate runoff rates before discharging at controlled rates to receiving watercourses; • design of any holding or settlement lagoons or other treatment system required prior to discharge to the environment; • details of mitigation measures for all work or compound areas located within flood risk areas; • where construction activities would be located, preferably outside of the floodplain; and |



| Commitment Number | Commitment |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> details of any water abstraction and discharge points relating to the works. |
| G182 | Headwalls to temporary circular culverts would be constructed to the appropriate standard. |
| G184 | Stockpiles would not be located within 10m of any main rivers or ordinary watercourse crossings. |
| G185 | Temporary haul and access road construction material within Flood Zone 3 and areas of High and Medium RoFSW would be removed at the end of the construction phase and the ground surface would be reinstated to pre-project levels. |
| G186 | Where appropriate, cross-fall would be installed on access and haul roads to direct runoff away from the pipeline trench. Runoff would be collected at the side of the haul road and discharged to ground if relevant or to an appropriate nearby watercourse or sewer in accordance with the provisions of the DCO. |
| G198 | The project would incorporate appropriate surface water drainage measures into its final design for the haul roads and access tracks so that they do not lead to a significant increase in flood risk. |
| W1 | The extent of Flood Zone 3 and areas of RoFSW would be identified and marked where appropriate. |
| W2 | Screening and fencing within logistics hubs and construction compounds would be designed to reduce the impedance of flood water. This would be subject to any commitments regarding great crested newts. |
| W4 | Afflux at temporary main rivers and ordinary watercourse crossings would be maintained at less than 100mm. |
| W5 | Topsoil and subsoil would be stockpiled for as short a duration as practicable within Flood Zone 3 and areas of High and Medium RoFSW. |
| W6 | Stockpiles in Flood Zone 3 or areas of High or Medium RoFSW would not exceed 10m between breaks. Breaks in between stockpiles would be at least 1m. Breaks would be located opposite each other on either side of the excavation where practicable. |
| W19 | There would be no land raising undertaken in locations identified as Flood Zone 3. |

- 4.4.2 An Emergency Action Plan is included in the CEMP as Appendix A. This sets out procedures and methods to be implemented in the case of unplanned events such as an extreme flood event and is not duplicated in the WMP. As part of this, the project will subscribe to flood and weather warnings as outlined in commitment G127. Weather reports will also feature in the prestart brief for each worksite on a daily basis.
- 4.4.3 This section of the WMP sets out the measures that would be taken to reduce flood risk across the project. It also outlines how the commitments would be implemented during construction and the measures that will be taken at specific sites at risk of flooding such as avoiding storage of equipment and materials within the floodplain. There are no construction compounds within London Borough of Hounslow.
- 4.4.4 Many of the commitments within this section have been developed during discussions held with the EA and the LLFAs. As stated within commitment G123, the project will work in compliance with permits and licences issued by those bodies.
- 4.4.5 Commitment G39 states that a buffer zone should be maintained along watercourses which would allow for unimpeded rises in water levels during high water events. Commitments specific to flood risk also seek to use good design to reduce the creation of runoff. Commitment G126 states that permeable surfaces should be used for new surfacing on site so that water permeates into the ground, if it is not already saturated, rather than running off into watercourses. At open cut watercourse crossings,



commitment W4 seeks to limit the difference in height between water levels above and below the open cut section to less than 100mm to limit the rate of flow downstream of the works. Commitment G182 controls the design of header walls to limit the build-up of water upstream of culverts during high water events.

- 4.4.6 Commitments G184, W5, W6 and W7 are specifically targeted at controlling the locations of stockpiles across the site but particularly near watercourses, within Flood Zone 3 and areas of high or medium RoFSW. These measures are proposed to reduce the risk that stockpiles inhibit the flow of flood waters or reduce flood storage capacity. To this end, heights of stockpiles and breaks in between are specified.
- 4.4.7 Activities within Flood Zone 3 and areas of high and medium RoFSW are controlled by commitments G124, G125, G185, W1 and W19. This is to locate activities and storage outside those areas with a greater annual probability of river flooding.
- 4.4.8 Positioning and specification of screening and fencing across the project would be such that flood waters would not be impeded in line with commitment W2.
- 4.4.9 Portable welfare facilities will be sited at least 10m from the top of bank of watercourses and outside of Flood Zone 3 wherever possible.



5 Site Checks and Reporting

5.1 Site Checks

- 5.1.1 . The contractor(s) will be responsible for record keeping and site checks during the construction period
- 5.1.2 Site checks and inspections will be undertaken regularly throughout the construction period as set out below, to monitor compliance with the requirements of the WMP. This will be in addition to the regular environmental inspections undertaken as identified in table 3.2 of the CEMP..
- 5.1.3 Table 5.1 sets out the site checks that would be undertaken during construction.

Table 5.1 Site checks

| Action | Responsibility | Frequency |
|---------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------|
| <i>Visual inspections to monitor storage of materials and soils</i> | <i>Works Supervisor</i> | <i>Once a month and after heavy rainfall</i> |
| <i>Monitoring weather conditions and flood alerts (when work site is within flood zone)</i> | <i>Works Supervisor</i> | <i>Daily</i> |
| <i>Review conditional and effectiveness of silt mitigating measures</i> | <i>Works Supervisor</i> | <i>Weekly. Daily during wet weather</i> |
| <i>Visual Watercourse Inspections</i> | <i>Works Supervisor</i> | <i>Daily (When working within 10m of watercourse)</i> |

5.2 Complaints Procedure

- 5.2.1 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.
- 5.2.2 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.