Project Title:	**HOYLES LANE SUPPLY AND DEMAND (C&D PO 004)**
Project No:	**80061057-02**
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80061057– HOYLES LANE SEWER UPGRADE

Environmental Control Plan v1.2

8th December 2023

View west of Lancaster Canal crossing point from Quaker Bridge, Sidgreaves Lane

emerald green ENVIRONMENTAL MANAGEMENT SERVICES

REVISIONS TABLE

Version No.	Date	Status	Author/ Reviewer	Comments
0.1	24/07/23	First Draft Superseded	S Appleton	First draft for internal review
0.2	07/08/23	First Draft Superseded	S Appleton / R Sykes	First draft for Bethell review / input
1.0	22/09/23	Live Superseded	A Townsend / S Appleton	Amendments made following Bethell's comments
1.1	30/11/23	Live Superseded	R Sykes / J Shaw & P Feasby	Updated eSTAR, amendments made regarding GCN DLL and HRA, change of names in Roles & Responsibilities
1.2	08/12/23	Live	R Sykes / J Shaw & P Feasby	Updated with comments from UU re. Regulatory Permissions, Biodiversity Net Gain and Saturday working hours.

Emerald Green Environmental Management Services (EGEMS) Ltd.
Company No. 11986570

077393 656 044
hello@egems.co.uk
www.egems.co.uk

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1. INTRODUCTION

1.1 Purpose of Document

Bethell have commissioned Emerald Green Environmental Management Services Ltd. (EGEMS) to provide their Lead Environmentalist position, for the purposes of fulfilling the requirements under S08 Section 2, for this project.

This Environmental Control Plan (ECP) fulfils Bethell's contractual environmental management obligations of United Utilities' (UU) Environmental Management Specification S08, for the AMP7 contract. It is a 'live' document, which will evolve and develop in line with the detail of the project's design and implementation measures, as well as in response to any reactive changes that are required following commencement of construction.

A copy of UU's S08 Compliance Checklist for the latest version of this ECP can be found in Appendix B.

1.2 Location and Setting of Works

The proposed works are located in Cottam, Preston, located approx. 6km north-west of Preston town centre. The scheme extends between Hoyles Lane, Cottam and Lea Gate Wastewater Pumping Station (WwPS), 1.5km south of the village of Lea Town.

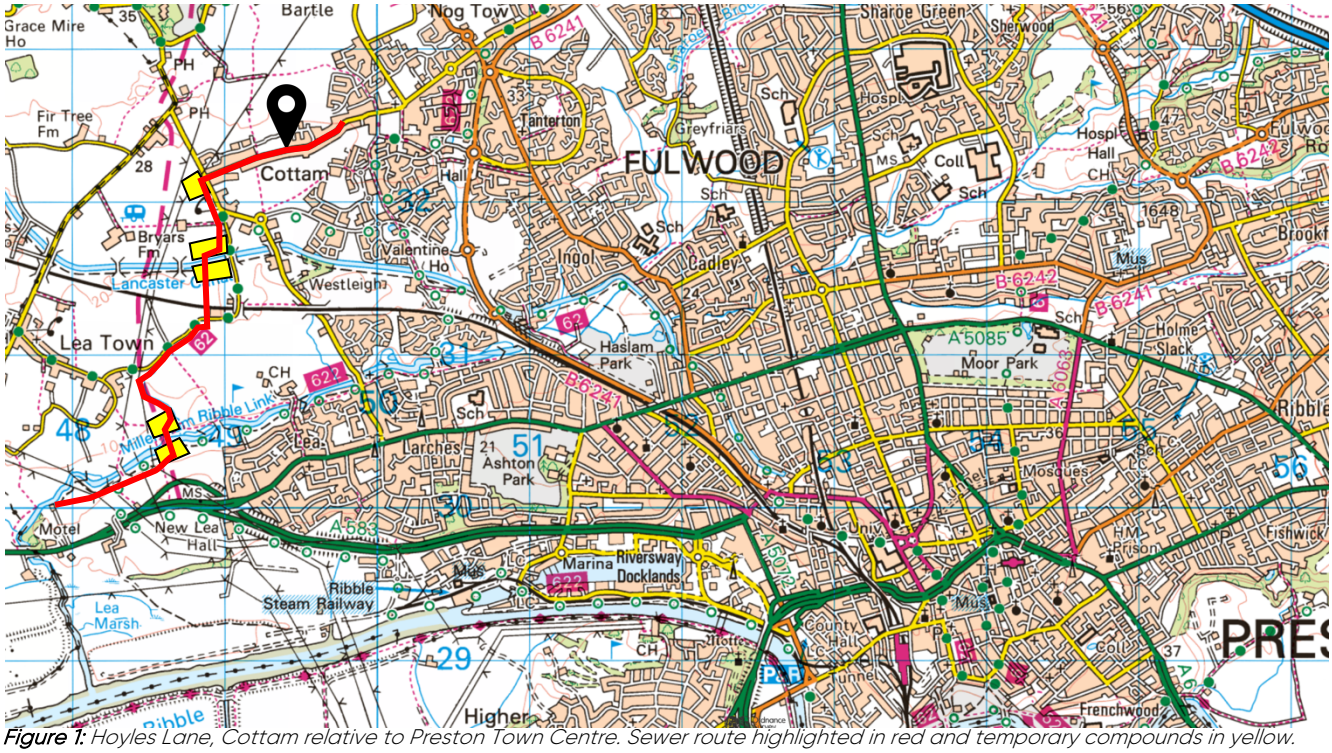

Figure 1: Hoyles Lane, Cottam relative to Preston Town Centre. Sewer route highlighted in red and temporary compounds in yellow.

The sewer improvement works commence at the junction of Westward Close and Hoyles Lane and run west to the junction of Sidgreaves Lane, before extending south parallel to the west side of the highway onto agricultural fields and open countryside. The pipeline route continues in a southerly direction, through fields and crossing multiple key features, including various minor and major highways, Lancaster Canal (a wildlife corridor and Biological Heritage Site [BHS]), the Blackpool-Preston railway line, around the western perimeter of Ashton & Lea Golf Club, before crossing Savick Brook (also a BHS). From the south side of Savick Brook, the new sewer runs in a south-westerly direction, crossing the recently completed Preston West Distributor Route (PWDR) before connecting into the existing Lea Gate WwPS. The total length of the sewer route is approximately 4 kilometres. For further detail, refer to drawings 80061057-GHD-MISCE-99-DR-01-00001 and 80061057-GHD-MISCE-99-DR-01-00002.

The 2 No. BHS and wildlife corridors (Lancaster Canal and Savick Brook) are to remain unaffected by the works to ensure the protection of these habitats and associated biodiversity. Quaker Bridge,

crossing Lancaster Canal is a Grade II Listed Building, and not to be used or impacted by the temporary works traffic or activities.

The entire scheme falls within Natural England's Impact Risk Zone (IRZ) for the Ribble and Alt Estuaries Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and Ramsar, which is located 2.4km southwest of the site and Newton Marsh SSSI which is located 2.3km west of the site. which provides habitat for protected bird species, including Northern Lapwing *Vanellus vanellus* and Long Billed Dowitcher *Limnodromus scolopaceus*. An Assessment of Likely Significant Effects shall be undertaken to determine the scheme's potential impacts on these features, and if necessary, a Habitat Regulations Assessment shall be submitted to Natural England for review, prior to obtaining a Regulation 77 consent.

Great crested newt *Triturus cristatus* (GCN) was confirmed present in 3 No. of the 33 No. ponds located within 250m of the proposed works (Pond Ref. Nos 8, 26 and 51). A District Level Licence is to be obtained from Natural England, prior to works commencing.

The north half of the working area is semi-urban, with residential properties located on Hoyles Lane and Sidgreaves Lane, as well as being close to a local Primary School (Lea Endowed School). To the south, the local landscape is a mixture of open countryside, arable farming land, and broadleaved woodland, bound by a mix of dense scrub and hedgerows. Lancaster Canal and Savick Brook are both distinct water features of the local landscapes character. Savick Brook is classed as a Main River, with its flood plain extending into the fields to the north and south sides of the new sewer's crossing point. Works within this area will require a Flood Risk Activity Permit. Lancaster Canal is managed by Canals and Rivers Trust and consent is to be obtained for any works with potential to affect this feature. Minor open field drains (classed as Ordinary Watercourses) are also within the proposed working area at several locations and any works with potential to impede flows within these features will require Consent from Preston City Council's Local Flood Team.

The temporary construction works for the sewer improvements will be visible from residential properties on Hoyles Lane, Sidgreaves Lane and several properties along Darkinson Lane. In addition, the site may be visible to recreational users from the wildlife corridors and Public Rights of Way (PRoW) that connect Darkinson Lane and Savick Brook which are expected to be impacted by the temporary works. Public access via the PRoWs shall be maintained for the duration of the construction works.

1.3 Scope & Duration of Works

The existing sewer network for Hoyles Lane is undersized for the flow that is generated within the catchment during heavy wet weather events. This results in localised internal and external flooding of multiple properties in the vicinity of the sewer.

The objectives of this project are to improve the capacity of the existing sewer network at Hoyles Lane, by providing protection against foul flooding associated with storm events with a return period of less than 1 in 30 years. It will also help to resolve and maintain the impact of the North West Preston Strategic Development Site Plan on the Lea Gate Catchment Plan, which involves future property development by 2040.

The works include the upsizing and installation of approximately 4km of new 600mm diameter sewer pipeline. This is to be installed via a combination of open-cut (within Hoyles Lane and field areas), and trenchless/tunnelling methodologies (under Lancaster Canal, Blackpool-Preston railway, Savick Brook and the new PWDR). Several temporary compound areas are to be located adjacent to the sewer pipe easement. Refer to drawings 80061057-GHD-MISCE-99-DR-01-00001 and 80061057-GHD-MISCE-99-DR-01-00002 for further detail.

Further details can be found in the Construction Phase Plan (Bethell Doc. Ref. TBC) and Traffic Management Plan (Bethell Doc. Ref. 80061057-02-BET-MISCE-99-RP-W-00019). The temporary working area will be reinstated according to the Landscaping Reinstatement Plan (Appendix C).

Subject to obtaining all relevant regulatory consents, commencement of the project is programmed for January 2024, to be completed by May 2025.

1.4 Summary of Supporting Environmental Reports

This EMP is based on the findings and recommendations of the following environmental reports, copies of which can be found in Appendix J:

- Preliminary Ecological Appraisal (Ecology Services Ltd., November 2023);
- Bat Ground Level Roost Survey Report (Ecology Services Ltd., September 2023);
- Otter Survey Report (Ecology Services Ltd., August 2023);
- Badger Pre-Commencement Survey (Ecology Services Ltd., TBC);
- eDNA GCN Survey (Ecology Services Ltd., May 2023);
- Water Vole Survey (Ecology Services Ltd., October 2023);
- Tree Survey & Arboricultural Impact Assessment (ACS Consulting, November 2023);
- Habitats Regulations Assessment (Ecology Services, November 2023);
- Geotechnical Preliminary Risk Assessment (Smith Grant LLP, November 2023);
- Surface Water Management Plan (Bethell, November 2023);
- Flood Risk Assessment Report (Waterco, June 2023).

1.5 Summary of Key Environmental Risks

Following an initial environmental aspects and impacts risk assessment, the key unmitigated environmental risks (i.e. assessed as High and Very High) for the project are as follows:

- Flood Risk – The Environment Agency's Flood Risk Map indicates that the temporary working area for the sewer is within Flood Risk Zone 3, which means in any year the land has a 1% or greater chance of flooding from rivers.
- Environmental Permits – A Flood Risk Activity Permit will be required for the temporary tunnelling works within the floodplain areas. A Permit To Pump (from United Utilities), and Abstraction and Dewatering Permits (from the Environment Agency) may be required, subject to the finalised design of the sections to be installed using trenchless methods. Due to the works' proximity to the Newton Marsh Special Area of Conservation (SAC), Natural England have been consulted on the findings of the Habitat Regulations Assessment, and a Regulation 77 Consent shall be required from the Local Planning Authority to confirm the temporary works' status as Permitted Development.
- Surface Water Management – Parts of the temporary working areas are situated within floodplain (the area situated close to Savick Brook) or on sloping banks. The trenchless method to install the new sewer route underneath the brook and bypass carries a risk of silts or drilling fluids (if used) from migrating from the void bore to the watercourse above. The stripping of topsoil and subsoil may also pose a risk of uncontrolled silt run off to enter the watercourse during intense rainfall events.
- Ground Water Management - The excavation of the below-ground tank for the WwPS is expected to require continual dewatering during the excavation and installation phases. This water is anticipated to require high volumes (exceeding the 20m3 per day Regulatory Positioned Statement) to be discharged at significant flow rates, which cannot be accommodated by the downstream sewer network and so will have to be discharged into the natural environment.
- Noise & Vibration – The sewer improvement works are in close proximity to residential areas surrounding Hoyles Lane and Sidgreaves Lane and recreational wildlife corridors. The southern working area around Lea Gate also is surrounded by single properties and farms. There are significant risks to customer complaints during the temporary construction without appropriate mitigation measures implemented.
- Ecology – A Preliminary Ecological Assessment (PEA) was undertaken by Ecology Services in May 2023. The temporary working area falls within the consultation zones of influence of the Ribble & Alt Estuaries and Newton Marsh SAC/SSSIs, which are cited for providing important habitat for over-wintering migratory bird species. Additional targeted surveys for ground-level tree bat roost potential, otters and badgers and water vole have been completed. Some trees provide suitable

habitat for bat roosting, in addition to the grouped vegetation along the wildlife corridors providing suitable foraging and commuting habitats for bats and birds. Records of otters were found at Savick Brook and connecting field ditches. Both water bodies provide potential foraging/commuting habitat for otters and water voles. Potential otter burrows/holts have been identified in the open field drain west of the junction of Hoyles Lane and Sidgreaves Lane.

- Great Crested Newts (GCN) – A GCN walkover, Habitat Suitability Index and eDNA sampling were all completed in May 2023 to scope surrounding ponds for GCN presence. The reports found three ponds (refs 8, 26 & 51) with positive samples of GCN population. The proposed working areas are located within 250m of the identified ponds. It is an offence under current legislation to disrupt or injure GCN, therefore a derogation licence, submitted to Natural England must be applied for prior to the start on site. A District Level Licence (DLL) application has been obtained from Natural (Ref. DLL-ENQ-LANC-00055, 09/11/2023). The DLL shall be updated in line with any subsequent changes to the temporary working area. All mitigation measures must be implemented to ensure compliance and protection of GCN.
- Invasive Species & Biosecurity – There is an area of buried Japanese knotweed present within or close to the working area, as well as several areas of Himalayan Balsam located at the junction of Darkinson Lane and the Preston West Distributor Road.
- Biodiversity – The working areas that are to be undertaken under Permitted Development Rights shall aim to achieve No Net Loss of Biodiversity (BNNL) through like-for-like reinstatement. For the areas requiring Planning Permission, opportunities for Biodiversity Net Gain (BNG) shall be sought where practicable. Any BNNL/BNG designs shall be incorporated into the Landscaping Reinstatement Plans, which shall demonstrate how the loss of any trees and sections of hedgerow shall be compensated for. Biodiversity impact assessments (i.e. quantified using the current NE Biodiversity Metric) may be required by United Utilities to demonstrate BNNL/BNG.
- Trees - An Arboricultural Survey & Impact Assessment (AIA) was produced by ACS Consulting in July 2023. There are several mature trees and several Tree Preservation Orders identified within and adjacent to the temporary working areas, which are to be retained and protected. The root zones of some of these trees overlap with the proposed working areas. The installation of Tree Protection Fencing at the beginning of the establishment of the temporary working area, and supervision of works occurring within trees' root zones and root protection measures (under the supervision of the Project Arborist) are key requirements to ensure these trees are adequately protected.
- Reinstatement – The correct reinstatement of the new sewer upgrade is essential to minimise the impact on the natural environment and habitats, in addition to the visual impact of the open countryside. A tailored reinstatement of the temporary working area will be a key concern for Landowners and Customers. The successful reinstatement of the temporary working areas is a key requirement.
- Public Rights of Way (PRoW) – There are 2 No. PRoWs that are potentially affected by the works, both connect Darkinson Lane to different entries of Savick Brook. The public footpath of Hoyles Lane will also be affected and potentially cause disruptions. Temporary closures are expected and diversions implemented accordingly.
- Energy & Fuel - High Volume Risks & Minimisation Opportunities – The sections of the sewers that are to be tunnelling are likely to generate significant volumes of subsoil and stone which will require removal off-site. The dewatering of deep excavations will require continual pumping operations. In the absence of innovative alternative solutions, these activities are likely to utilise a significant quantities of diesel fuel.
- Aggregates Requirements - High Volume Risks & Minimisation Opps. – The establishment of haul roads are likely to require significant volumes of aggregates. The sourcing and disposal of these materials has potential to contribute to significant off-site environmental impacts. A circular-economy approach shall be adopted wherever practicable.

A summary of the key risks can be found in Section 3 below. A complete listing of these and additional (Medium & Lower) risks and mitigation detail can be found in Appendix B.

2. ENVIRONMENTAL MANAGEMENT

2.1 Environmental Policies

Bethell's Environmental Policy shall be displayed on the site's information board.

A copy of the policy can be found in Appendix G.

2.2 Project Team & Responsibilities

The key personnel involved in the project are listed in the table below:

Position	Name	Telephone	Email
UU Project Manager	Ian Tomlinson	07767 233 062	ian.tomlinson@uuplc.co.uk
UU Env. Planner	Katie Eyres	07342 076 660	katie.eyres@uuplc.co.uk
UU Snr. Ecologist	Jennifer Shaw	07587 551 786	jennifer.shaw@stantec.co.uk
UU Prp. Landscape Architect	Brian Tollitt	07831 108 006	brian.tollitt@uuplc.co.uk
UU Construction Supervisor	Daniel Thomson	07584600989	daniel.thomson@uuplc.co.uk
Bethell Framework Director	Alison Owen	07500 032 903	alison.owen@bethell.co.uk
Bethell Operations Director	Gerry McCoy	07767 811 844	gerry.mccoy@bethell.co.uk
Bethell Senior Project Mgr.	Paul Feasby	07769 743 309	paul.feasby@bethell.co.uk
Bethell Site Project Mgr.	Adrian Townsend	07583 671 328	adrian.townsend@bethell.co.uk
Bethell Project Design Mgr.	Luke Kolakowski	07969 486 370	luke.kolakowski@bethell.co.uk
Bethell Project Engineer	Jamie Foxcroft	07730 600 339	jamie.foxcroft@bethell.co.uk
Bethell Lead Env. Planner	Lauren Davison	07341 564 362	ldavison@wardell-armstrong.com
Bethell Env. Constr. Advisor	Rick Sykes	07393 656 044	ricksykes@egems.co.uk
Bethell HSEQ Manager	Nana Sarpong	07970 604 883	nana.sarpong@bethell.co.uk
Bethell Arborist	Ian Murat	07595 280 404	mail@acsconsulting.co.uk
Bethell Eco. Clerk of Works	TBC	TBC	TBC

The environmental responsibilities of Bethell's project team are allocated as follows:

Bethell Site Project Manager:

- Enabling and supporting all roles with delivery of Environmental Control Plan requirements
- Communication of Environmental Responsibility Performance information to UU Project Manager
- Undertaking monthly reviews and updates of this ECP
- Ensuring water quality monitoring at dewatering discharge undertaken
- Ensuring daily walk-round of silt control measures undertaken
- Delivery of environmental induction training to Site Team
- Ensuring environmental mitigation and toolbox training is implemented correctly by Site Team staff
- Ongoing inputting of sustainability data onto UU SmartWaste online tool
- Undertaking weekly maintenance inspections of environmental mitigation measures
- Ensuring improvement actions from weekly maintenance inspections are closed out
- Reporting completion of improvement actions from monthly maintenance inspections to Contracts Manager, Environmental Construction Advisor and HSEQ Manager
- Supporting Environmental Construction Advisor and HSEQ Manager in investigation and reporting of Environmental Incidents
- Ensuring Refuelling procedures are followed

- Ensuring COSHH stores and Spill Kits are maintained and adequately stocked
- Supporting delivery of continual improvement in project's Environmental Responsibility performance
- Supporting Environmental Manager and HSEQ Manager with continual improvement in Environmental Responsibility Performance
- Supporting HSEQ Manager in investigation and reporting of Environmental Incidents

Bethell Lead Environmental Planner:

- Obtaining relevant Planning Consents and Environmental Permits

Bethell Lead Environmental Construction Advisor:

- Development of this ECP
- Supporting Lead Environmental Planner with obtaining Environmental Permits
- On-site delivery of detailed ECP and RAMS training to Site Project Manager and Project Engineer
- Set-up of project workspace on UU SmartWaste online tool
- Undertaking of the water quality monitoring of the dewatering treatment process discharge, as per the Surface Water Management Plan
- Undertaking monthly S08 Environmental Inspection
- Communication of Environmental Responsibility KPI performance information to all Project Team (as required by UU S08)
- Supporting HSEQ Manager with investigation and reporting of Environmental Incidents
- Supporting HSEQ Manager with guidance on and improvements to environmental mitigation
- Supporting HSEQ Manager with delivery of continual improvement in Environmental Responsibility Performance

Bethell Arborist:

- Providing expert arboricultural support to Bethell's Site Project Manager and Lead Environmental Construction Advisor
- Supporting Bethell's Site Project Manager during the delivery of the Arboricultural toolbox talk
- Providing on-site arboricultural supervision during works within tree root zones, as per the Arboricultural Precautionary Working Method Statement

Bethell Ecological Clerk of Works:

- Providing expert ecological support to Bethell's Site Project Manager and Lead Environmental Construction Advisor
- Supporting Bethell's Site Project Manager during the delivery of ecological toolbox talks
- Providing on-site ecological and biosecurity supervision during works that impact on protected species or designated habitats, as per the Ecological Precautionary Working Method Statements and Biosecurity Management Plan.

Bethell HSEQ Manager:

- Delivery of continual improvement in Environmental Responsibility Performance
- Investigation and reporting of Environmental Incidents
- Supporting Site Project Manager with guidance on and improvements to environmental mitigation
- Supporting Environmental Construction Advisor with undertaking monthly S08 Environmental Inspection

3. ENVIRONMENTAL ASPECTS & IMPACTS - RISKS AND MITIGATION

The following table details the key environmental risks to the project (ranked High to Very High), prior to application of appropriate mitigation measures. The complete environmental risk assessment can be found in Appendix C.

Environmental Aspects		Unmitigated Impact Risk Details	L1	S1	UR	Proposed / Recommended Mitigation	L2	S2	RR
Environmental & Planning									
Env03	Environmental Impact Assessment Screening Opinion	Potential Delay Risk - The total working area (>1km) of the proposed development has triggered the submission of an Environmental Impact Assessment Screening Opinion (EIA SO) to the Local Authority. Grounds for rejection could lead to significant delays to the current programme.	**1**	**4**	**H**	1) Preliminary and Targeted Ecological surveys shall be undertaken and the relevant findings/ recommendations shall be incorporated into the ECP. 2) A Habitats Regulations Assessment (HRA) is being undertaken and the relevant mitigation recommendations shall be incorporated into the ECP. 3) Regulation 77 consent shall be obtained from the LPA, and any relevant conditioned requirements shall be incorporated into the ECP. 4) A Landscaping Reinstatement Plan shall be produced incorporating the relevant requirements of national and local planning policies and any relevant stakeholders. This shall be implemented at the end of the works and maintained thereafter in accordance with agreed requirements. 5) All works within the vicinity of Quaker Bridge (crossing Lancaster Canal - a Grade II Listed structure) shall be designed to minimise any potential structural impacts. 6) The Preston West Distributor CEMP shall be reviewed any relevant, post-completion mitigation controls shall be incorporated into the ECP. 7) An EIA SO shall be submitted to the Local Planning Authority.	**1**	**2**	**L**

Env04	Planning Applications & Conditions	Potential delay risk – Subject to the acceptance of the EIA SO, planning permission will be required for the temporary construction and permanent access points at various points, TBC with the finalised design. All other features of the proposed development are considered under Permitted Development.	**2**	**3**	**H**	1) Preliminary and Targeted Ecological surveys shall be undertaken and the relevant findings/recommendations shall be incorporated into the ECP. 2) A Habitats Regulations Assessment (HRA) is being undertaken and the relevant mitigation recommendations shall be incorporated into the ECP. 3) Regulation 77 consent shall be obtained from the LPA, and any relevant conditioned requirements shall be incorporated into the ECP. 4) A Landscaping Reinstatement Plan shall be produced incorporating the relevant requirements of national and local planning policies and any relevant stakeholders. This shall be implemented at the end of the works and maintained thereafter in accordance with agreed requirements. 5) All works within the vicinity of Quaker Bridge (crossing Lancaster Canal - a Grade II Listed structure) shall be designed to minimise any potential structural impacts. 6) The Preston West Distributor CEMP shall be reviewed any relevant, post-completion mitigation controls shall be incorporated into the ECP.	**1**	**3**	**M**
Env06	Flood Risk Zones, Climate Change Adaptation & Resilience	Potential Delay Risk - A search of the Environment Agency's Flood Risk Map indicates that the Savick Brook to Lea Gate section of the temporary working area is within and surrounded by Flood Risk Zone 3. There may be a risk of flood events occurring during the works.	**2**	**3**	**H**	1) A Flood Risk Assessment (FRA) shall be undertaken to evaluate the impact of the permanent and temporary works. The recommendations shall be incorporated into the ECP. 2) A FRAP for the relevant activities shall be applied for and obtained from the Environment Agency prior to commencement of works. Any conditioned requirements shall be incorporated into the ECP. 3) A SuWMP, identifying sources, pathways and receptors and mitigation control measures, shall be developed and incorporated into the ECP.	**1**	**2**	**L**

Env07	Surface Water Management & Pollution Control	Potential Water Pollution Risk – Parts of the temporary working area are situated within the flood plain (the fields north and south of the Lancaster Canal and the fields surrounding Savick Brook) and on agricultural grassland. The use of a trenchless system to install the pipeline route underneath Savick Brook and Lancaster Canal poses risk of silts and/or drilling fluids (if used) migrating to the watercourse. The stripping of topsoil and subsoil proposed for the agricultural farmland poses a significant threat of uncontrolled silt runoff to enter the watercourse during periods of heavy rainfall without appropriate mitigation measures being applied.	**2**	**3**	**H**	1) A Surface Water Management Plan (SuWMP), identifying sources, pathways and receptors and mitigation control measures, shall be developed and incorporated into the ECP. 2) Method-appropriate Incident Response Procedures shall be developed for the trenchless installation phase, and incorporated into the ECP.	**1**	**3**	**M**
Env08	Ground Water Management & Pollution Control	Potential water pollution risk. The excavation of the launch and reception shafts for the tunnelling sections is likely to require continual dewatering for the duration of their use. This dewatering may require significant volumes (exceeding the 20m3 per day Regulatory Positioned Statement) to be discharged at substantial flow rates, which are unlikely to be able to be accommodated by the downstream sewer network and will therefore have to be discharged into the natural environment. There is therefore a significant risk for water pollution to occur from uncontrolled dewatering, without appropriate mitigation measures being applied.	**2**	**3**	**H**	1) A Dewatering Management Plan, identifying potential pollution types and prescribing appropriate mitigation control measures, shall be developed and incorporated into the ECP. 2) An Abstraction Permit shall be applied for and obtained from the Environment Agency prior to commencement of dewatering. Any conditioned requirements shall be incorporated into the ECP, where required. 3) A Bespoke Discharge Permit shall be applied for and obtained from the Environment Agency prior to commencement of dewatering. Any conditioned requirements shall be incorporated into the ECP, where required. 4) A Permit To Pump shall be applied for and obtained from United Utilities prior to commencement of dewatering.	**1**	**3**	**M**

Env10	Permits - Main Rivers - Flood Risk Activity Permit (EA)	Potential Delay Risk - A search of the Environment Agency's Main River Map indicates that Savick Brook is classed as a main river. The proposed development requires tunnelling works underneath Savick Brook for the new pipeline route. Therefore, a Flood Risk Activity Permit (FRAP) is required for the works.	**2**	**3**	**H**	1) A Flood Risk Assessment (FRA) shall be undertaken to evaluate the impact of the permanent and temporary works. The recommendations shall be incorporated into the ECP. 2) A FRAP for the relevant activities shall be applied for and obtained from the Environment Agency prior to commencement of works. Any conditioned requirements shall be incorporated into the ECP. 3) A SuWMP, identifying sources, pathways and receptors and mitigation control measures, shall be developed and incorporated into the ECP.	**2**	**2**	**M**
Env12	Permits - Discharge Permit (EA) and/or Client Permit To Pump	Potential Delay and/or Pollution Risk – there is the potential risk of pollution from the tunnelling activities adjacent to the railway, canal and Savick Brook, subject to the finalised dewatering requirements TBC by Bethell. If this is to be undertaken for longer than 3 months, a Bespoke Discharge Permit will be required. A Permit to Pump may also be required from UU (as per UU's Standard Operating Procedure (SOP) WwP/S/001/21/04).	**4**	**2**	**H**	1) A Dewatering Permit shall be obtained (if dewatering required for more than 3 months). 2) All conditioned requirements of the Dewatering Permit shall be incorporated into the ECP. 3) All conditioned requirements of the Dewatering Permit shall be complied with for duration of the associated temporary works. 4) A Water Quality Monitoring Plan shall be developed, incorporated into the ECP and implemented on site, under supervision of a competent Environmental Clerk of Works. 5) A Permit to Pump shall be obtained from UU.	**2**	**1**	**L**
Env13	Permits - Abstraction Permit (EA)	Potential Delay Risk – subject to the finalised groundwater abstractio n requirements TBC by Bethell, there is the potential requirement of dewatering for the new pipeline route. Where this is to be undertaken for longer than 3 months or more than 20m3 per day is to be dewatered, an Abstraction Permit will be required.	**4**	**2**	**H**	1) An Abstraction Permit shall be obtained (if dewatering required for more than 3 months or if more than 20m3 per day anticipated to be dewatered). 2) All conditioned requirements of Dewatering Permit to be incorporated into the ECP. 3) A Water Quality Monitoring Plan shall be developed, and incorporated into the ECP.	**2**	**1**	**L**

Env15	Permits - Other Environmental Permits, Licences or Consents	Potential Delay Risk – the proposed development is within the SSSI zone of influence of the River Ribble & Alt Estuaries and Newton Marsh SSSI/SAC which may require NE Assent for the main works, TBC by the finalised design. The tunnelling activity underneath the Lancaster Canal will require notification to the Canals and Rivers Trust for confirmation. Objections to either the Assent and application notice may lead to delays of the project.	**2**	**3**	**H**	1) Preliminary and Targeted Ecological surveys are required and the findings/recommendations will be incorporated into the ECP. 2) A Habitats Regulations Assessment (HRA) is required due to the site being within the SAC/SSSI Zone of Influence at Newton Marsh and is currently being produced. 3) Regulation 77 consent shall be obtained from the LPA, and any relevant conditioned requirements shall be incorporated into the ECP. 4) An ECP shall be produced and implemented on site. 5) A detailed application of the proposed development will be submitted to the Canals and Rivers Trust at least 3 months prior to the commencement on site.	**2**	**1**	**L**
Env17	Nuisance Management - Noise & Vibration	Potential Customer Complaints and/or Delay Risk - The northern site of the proposed sewer upgrade is surrounded by residential properties (specifically Hoyles Lane) businesses and a local primary school. The proposed southern working area is comprised of wildlife corridors, the Lancaster Canal and Open Public Green spaces, all used for peaceful recreational purposes. There are also multiple farms located in close proximity of the working area. Although there has been no noise survey completed, there are significant risks of customer complaints during construction without the appropriate mitigation measures implemented.	**3**	**4**	**VH**	1) Site investigations shall be undertaken to identify best available construction methodologies and requirements for noise and/or vibration monitoring. 2) Works shall be undertaken in accordance with BS 5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites, where deemed applicable. 3) Regular Customer and Stakeholder communications shall be delivered, to keep well informed of site activities and progress. 4) Preston Environmental Health Officer shall be pre-notified of details of the construction programme and key activities, not less than 2 weeks prior to works commencing on site. 5) Working hours shall be limited to Mon-Fri 0800-1800, Sat 0800-1300, with no working Sundays or Bank Holidays.	**2**	**3**	**H**

Ecology										
Eco01	Ecological Designations (SAC, SSSI, Ramsar, SBI etc.)	Potential Delay Risk/ Potential Ecological Risk- The proposed working area is identified to be within the consultation zone of the Ribble & Alt Estuary and Newton Marsh SAC/SSSIs. In addition to this, an SPA zone is located more than 1km west of the working area. The key cited interest of these designations are migrating and wintering birds. Lancaster Canal and Savick Brook also partly fall into the SAC/SSSI impact risk zones. A HRA and Regulation 77 Consent are likely to be required; subject to the finalised temporary works' design. Lancaster Canal is also identified as a biological heritage site - an ecosystem with rich biodiversity.	**2**	**3**	**H**	1) Preliminary and Targeted Ecological surveys shall be undertaken and the relevant findings/recommendations shall be incorporated into the ECP. 2) A Habitats Regulations Assessment (HRA) is required due to the site being within the SAC/SSSI zone of influence at Newton Marsh and is currently being produced. 3) Regulation 77 consent shall be obtained from the LPA, and any relevant conditioned requirements shall be incorporated into the ECP.	**2**	**1**	**L**
Eco02	Surveys - Extended Phase 1 & Preliminary Ecological Appraisal	Potential Delay Risk / Potential Ecological Risk – A Preliminary Ecological Assessment Extended Phase 1 Habitat Survey was undertaken in April'23 by Ecology Services (ES) Ltd. The report concluded that: - The main habitats are within agricultural land and include poor semi – improved grassland, scattered shrubs, broadleaved woodland and species rich and poor hedgerows. - The working area and wider landscape falls within SAC/SSSI IRZs associated with Newton Marsh and the Ribble & Alt Estuary. - There are various trees that may provide suitable bat roosting habitats. - Great Crested Newts (GCN) were recorded within 1km of the working area. - There are records of otter at Savick Brook, although no evidence of otter were found during the PEA. - The watercourses and wildlife corridor provide suitable foraging and commuting habitats for birds, water vole and otter. - Invasive Non-Native Species (INNS) (Japanese Knotweed and Himalayan Balsam) is present within the temporary working area.	**4**	**3**	**VH**	1) PEA and targeted species surveys shall be undertaken prior to start of development. 2) Findings and recommended mitigation measures from the original and updated PEA and targeted survey reports shall be incorporated into the ECP. 3) A Habitats Condition Assessment and Baseline Biodiversity Metric shall be undertaken and practicable opportunities for Biodiversity Net Gain shall be incorporated into the Landscaping Reinstatement Plan.	**3**	**1**	**M**

Eco03	Surveys - Targeted	Potential for protected species to be impacted by the works / Potential for habitat degradation or loss as a result of inappropriate development – Targeted surveys of great crested newts, otter, water vole, badger, nesting birds are identified from the PEA as a recommendation for further investigation closer to the start of the works.	**3**	**4**	**VH**	1) Targeted otter surveys were completed in July'23 by Ecology Services Ltd. The survey areas included the banks around the Lancaster Canal and Savick Brook. 2) The first targeted water vole surveys were completed in July'23, with the second survey to be completed in August'23. The surveyed areas include Darkinson Lane, towards Savick Brook. 3) Targeted Ground Level Tree Roost surveys are required for all trees within and adjacent to the working area. Aerial Bat Roost Potential surveys are to be undertaken for the specified trees within the PEA with high roosting suitability. 4) A pre-development badger survey shall be undertaken not less than two months prior to start on site to confirm presence/absence of any badger setts. 5) Targeted eDNA GCN surveys were completed in May'23, confirming presence in 3 No. Ponds (refs. 8, 26 & 51). 6) A derogation licence (A District Level Licence) shall be obtained prior to commencement of works. Any relevant conditions shall be incorporated into the ECP. 7) Findings and recommendations from all above reports shall be incorporated into the ECP.	**2**	**2**	**M**
Eco05	Bats	Potential Ecological Impact - the PEA found that the proposed working area has two buildings and multiple trees that provide potentially suitable habitat for bat roosts. The wider survey area also contains woodland and trees suitable for roosting and foraging habitats. There is significant potential for bats to be present within or near the temporary working areas. Without appropriate mitigation measures implemented, there is risk of disturbance, injury or mortality to foraging and roosting bats.	**3**	**3**	**H**	1) Targeted Ground Level Tree Roost surveys have been undertaken on all trees within and adjacent to the working area to assess their potential for containing bat roosts. 2) Aerial Bat Roost Potential surveys have been undertaken on all trees within and adjacent to the working area that were identified in the Targeted Ground Level Tree Roost Surveys as having potential for bat roosts, to confirm the level of their suitability for containing bat roosts. 3) All findings and recommendations from the above reports are to be incorporated into the ECP.	**1**	**2**	**L**

Eco09	Great Crested Newts	Potential Delay Risk/Potential Ecological Impact/Potential Legal Risk - The PEA desktop study found records of Great Crested Newts (GCN) within 1km of the proposed working area. Around 30 ponds have suitable breeding habitats for amphibians and common toads within the 30m survey buffer. An eDNA GCN was produced in May'23 by ES Ltd. and confirmed the presence of GCN in ponds 8, 26 and 51. Without appropriate mitigation measures, it may lead to the injury/death of GCN populations. It is an offence to intentionally kill, injure or damage GCN under the Wildlife and Countryside Act (1981) and The Conservation of Habitats and Species Regulations 2017.	**3**	**4**	**VH**	1) A District Level Licence (DLL) for all works within 250m of the confirmed presence of GCN has been completed, submitted and acknowledged by Natural England. 2) Any ground investigation works located within 250m of the identified GCN ponds will require a site specific assessment by a licenced ecologist to determine if a Natural England derogation licence is needed. 3) If the proposed development area or working areas are altered, additional surveys may be required to extended the survey area where appropriate.	**3**	**2**	**M**
Eco11	Otters	Potential Delay Risk/ Potential Ecological Impact - The PEA's desktop survey found records of otters located at Savick Brook. The proposed site and wider survey area also indicated suitable habitats for otters, although there were no evidence of holts at the time of the PEA.	**2**	**3**	**H**	1) Targeted otter surveys were completed in July'23 by Ecology Services Ltd. The survey areas included the banks around the Lancaster Canal and Savick Brook to confirm the presence/absence of otter. 2) Findings and recommendations from the above report shall be incorporated into the ECP, including keeping the boundaries of all working areas more than 30 metres from potential otter habitat wherever practicable. 3) If identified as required by the Project Ecologist, Reasonable Avoidance Mitigation Method Statement (RAMMS) for otter shall be developed and incorporated into the ECP.	**2**	**2**	**M**
Eco18	Designations, Habitats Regs Assessments & NE Assents	Potential Delay Risk/Potential Ecological Impact - A SSSI Assent is required from NE for the works close to the consultation zone of the SAC at Newton Marsh due to the protection of the wintering birds. Failure to require Assent when necessary can lead to delay of the works. Lancaster Canal is also identified as a biological heritage site. Failure to implemented the correct mitigation measures may lead to ecological effects on species within the site.	**2**	**3**	**H**	1) Preliminary and Targeted Ecological surveys are required and the findings/recommendations will be incorporated into the ECP. 2) A HRA is required due to the site being within the SAC/SSSI zone of influence at Newton Marsh and is currently being produced. 3) Regulation 77 consent shall be obtained from the LPA, and any relevant conditioned requirements shall be incorporated into the ECP. 4) An appropriate ECP considerable of the findings and recommendations of the above reports shall be implemented on site.	**2**	**1**	**L**

Eco19	Invasive Species & Biosecurity	Potential Ecological Impact through the Spread of Non-Native Species (INNS) - The PEA identified a previous chemically treated and burned population of Japanese Knotweed and Himalayan Basalm remains located at the junction of Darkinson Lane and the PWDR.	**3**	**3**	**H**	1) A Biosecurity Management Plan shall be developed, incorporated into the ECP and implemented on site.	**1**	**2**	**L**
Eco20	Biodiversity Net Gain (BNG) Opportunities	Potential Delay Risk/Potential Ecological Impact - BNG Net Gain plans will be required for any elements of the project requiring Planning Permission. There is opportunity for BNG within the working area particularly within arable land south of the site. It is necessary to accurately demonstrate BNG No Net Loss to align with the Landscaping Reinstatement Plan, as several groups/individual trees and sections of hedgerow are to be removed. A BNG assessment will need to be reviewed in line with the finalised design.	**2**	**3**	**H**	1) An updated PEA shall be undertaken prior to the finalised design to calculate BNG opportunities. 2) Findings and recommendations from the PEA or Biodiversity Net Gain opportunities shall be reviewed and incorporated into the Landscaping Reinstatement Plan, where appropriate and to meet the conditions of landowner agreements.	**1**	**2**	**L**
Landscaping									
Lan03	Protection of Landscape and Visual Screening Trees	Potential for Ecological and Visual Impact - An Arboricultural Survey and Impact Assessment (AIA) was produced by ACS Consulting in July'23. There a several trees that have been identified as being of high quality and that are to be retained. Without appropriate project design and mitigation protection measures, these specimens may be impacted by the project.	**3**	**3**	**H**	1) An Arboricultural Impact Assessment (AIA) has been undertaken. The finding and recommendations of this survey shall be incorporated into the ECP. 2) Root Protection Areas (RPA) shall be calculated and appropriate tree and root protection measures implemented accordingly to retain and avoid damage to trees that are to be retained. 3) Approval for works to trees or within the root zones of trees protected by TPOs shall be made to the Local Authority's Tree Officer prior to undertaking these works.	**1**	**1**	**L**
Lan05	Reinstatement Requirements	Potential Ecological Impact - Lancaster Canal is a wildlife corridor and designated as a local Biological Heritage Site (BHS). The areas within and surrounding the working area are also within the SSSI and SAC consultation zones. Without appropriate mitigation measures and reinstatement, protected habitats and species could be affected in the short, medium and long term. Landscaping Reinstatement Plans must be developed to ensure preservation (i..e No Net Loss) and a long-term enhancement of biodiversity (i.e. Net Gain) , as well as the quality and amenity value of the landscape.	**3**	**3**	**H**	1) A Landscaping Reinstatement Plan shall be produced to mitigate for impacts identified in the AIA and to satisfy the requirements of the national and local planning policies and relevant stakeholders. 2) The Landscaping Reinstatement Plan shall be implemented at the end of the temporary works and shall be maintained thereafter, in accordance with contractually-specified requirements.	**2**	**2**	**M**

Sustainability										
Sus02	Energy & Fuel - High Volume Risks & Minimisation Opportunities	Potential cost risks. Potential for excessive carbon footprint. The sections of the sewers that are to be tunnelling are likely to generate significant volumes of subsoil and stone which will require removal off-site. The dewatering of deep excavations will require continual pumping operations. In the absence of innovative alternative solutions, these activities are likely to utilise a significant quantity of expensive and polluting diesel fuel,	**3**	**3**	**H**	1) Alternative power sources (e.g. zero carbon fuels, solar-supplemented generation, mains connection etc) shall be explored to power any dewatering operations. 2) Alternative fuel types shall be explored for on-site power generation, fuelling of construction plant and the off-site transportation of waste materials.	**2**	**2**	**M**
Sus03	Aggregates Requirements - High Volume Risks & Minimisation Opps	Potential cost risks. The establishment of long haul roads are likely to require significant volumes of aggregates. The sourcing and disposal of these materials has potential to contribute to significant off-site environmental impacts. A circular-economy approach should be adopted wherever practicable.	**3**	**3**	**H**	1) Quantity requirements for the importation of aggregates shall be minimised through well-considered design. 2) Aggregates shall be sourced as locally as practicable, with preference given to using appropriate-quality recycled aggregates over virgin materials. 3) Selection of aggregates shall be undertaken with an onward 'second life' re-use potential taken into consideration (e.g. a reduced 'buy-back' contract from the original supplier, or for re-use on an future United Utilities' or Third Party's construction project).	**2**	**2**	**M**
Third Parties & Stakeholders										
TPS02	Public Rights of Way	Potential Public Access and Safety Risk/Potential Community Complaints - Two Public Rights of Way (PRoW) connect Darkinson Lane to Savick Brook at different points. Access for residential properties on Hoyles Lane and respected farms to the south of the site will be affected by temporary public diversions, in addition to those travelling to the local primary school and recreational users of the wildlife corridors. It is likely that this may cause disruptions and complaints from residents, businesses and commuters.	**3**	**3**	**H**	1) A temporary PRoW closure and diversion shall be applied for and obtained, prior to commencement of the development. 2) A safely segregated temporary diversion shall be created around the temporary working area. 3) All Site Operatives shall be briefed on the presence of the temporary PRoW diversion to ensure that all public users are safely marshalled around the temporary working area.	**3**	**2**	**M**

4. GENERAL SITE ENVIRONMENTAL MANAGEMENT

4.1 Working Hours

Preston Council's Environmental Health Officer (name and contact details TBC) shall be informed of the project's start and finish dates prior to works starting on site. A copy of this correspondence shall be included in Appendix H.

Site working hours shall be 0800-1800 Mon-Fri, 0800-1300 Sat and no working on Sundays or Bank Holidays.

Where works are required outside of these hours, written permission confirmation shall be sought from United Utilities' Project Manager and the Local Authority's Environmental Health Officer shall be updated.

4.2 Site Housekeeping & Sustainability

A 'good housekeeping' policy shall be adopted across the site, with the following requirements:

- No littering, with removal of food waste and other rubbish at regular intervals
- No fires on site
- Switching off of lights, heaters, plant and generators when not in use
- Good maintenance of staff welfare facilities
- Considerate behaviour demonstrated by all site staff
- Maintenance of surface cleanliness of the highway with road sweepers (as required).

4.3 Staff Training

Following mobilisation and establishment of the temporary working, but prior to works commencing, all site staff shall be inducted to the site and have the key requirements of this Environmental Control Plan and the toolbox talks contained in Appendix E briefed to them by the Site Project Manager.

The Project-specific Toolbox Talks contained in Appendix E shall also be posted on the welfare cabin wall for ongoing reference and the Site Project Manager shall encourage Site Staff to review these monthly until the project's completion.

4.4 Site Induction

All visitors to site shall be made aware of the key environmental risks of the project as part of the site induction. The induction shall include talking the attendees through the key risks highlighted in Section 1.4 above and illustrated on drawing no. TBC (Appendix D), and their obligations with regards the mitigation measures.

The induction shall also include a summary of the Environmental Incident Escalation & Reporting Procedure (Appendix F), and the individual's obligations to it.

4.5 Waste Management Plan

It is estimated that the following types of waste will be generated by the project:

Waste Description	Est. Tons	LoW Code	Classification	Container Type
Excavation Arisings	TBC	17 05 04	Non-hazardous	TBC
Temp Compound Surfacing	TBC	17 05 04	Non-hazardous	
Road Planings	TBC	17 03 02	Non-hazardous	
*Clean Timber**	TBC	17 02 01	Non-hazardous	
*Mixed Metals**	TBC	17 04 07	Non-hazardous	
*Mixed Plastics**	TBC	17 02 03	Non-hazardous	
*Mixed General (Office/Canteen)**	TBC	20 03 01	Non-hazardous	
Used polypropylene geotextile (if segregated from sub-base)	TBC	17 02 03	Non-hazardous	
Oil & Fuel Wastes (e.g. waste fuels, oils, oil filters etc.)	TBC	13 08 99*	Hazardous	
Oil absorbents (e.g. used plant nappies, used spill kit materials, oily rags etc.)	TBC	15 02 02*	Hazardous	
Hazardous Wastes Packaging (e.g. paint cans, aerosols, VOC substances, shutter oil containers etc.)	TBC	15 01 10*	Hazardous	

** If metals, plastics, cardboards, timber and office waste are mixed, then LoW Code becomes 17 09 04*

If any Hazardous Wastes are generated, the correct disposal of these shall be arranged between the Site Project Manager and the Environmental Construction Advisor.

It is estimated that the following waste streams will be managed as follows:

Waste Description	Est. Tons	Reuse (Off Site)		Recycle (Off Site)		Landfill	
		Est. Rate	Tons	Est. Rate	Tons	Est. Rate	Tons
Excavation Arisings	TBC						
Temp Compound Surfacing	TBC						
Clean Timber	TBC						
Road Planings	TBC						
Mixed Metals	TBC						
Mixed Plastics	TBC						
Mixed General	TBC						
Geotextiles	TBC						
Total Hazardous Wastes	TBC						
TOTALS	TBC						

4.6 SmartWaste & Environmental KPI Reporting

A project workspace has been created on United Utilities' SmartWaste tool. All forecast waste types and volumes have been entered and will be updated as and when they are sent from site.

The Environmental Construction Advisor shall provide SmartWaste user training to Bethell's HSEQ Manager and Site Project Manager, who shall then be responsible for the routine updating of waste, fuel, energy, water, aggregates and timber data.

4.7 Environmental Inspections

The Site Project Manager shall be responsible for undertaking weekly inspections of the condition of the mitigation measures detailed in Section 3 above and for arranging for any maintenance to be carried out on the same day. To be able to demonstrate that this is being done, the Site Project Manager shall keep a log of their inspections and any maintenance that is undertaken.

Following mobilisation to site, the Environmental Construction Advisor shall attend the site monthly, to undertake an S08 Environmental Inspection, as per the requirements of S08, Section 2.9. The Environmental Construction Advisor shall share the findings and recommendations of these inspections with all members of the Bethell Project Team listed in Section 2.2 above.

The HSQE Manager shall also carry out a monthly HSEQ audit, which will assess environmental aspects of the project. The HSEQ Manager shall share the findings and recommendations of these inspections with the Senior Project Manager and Environmental Construction Advisor.

4.8 Refuelling

Refuelling of plant shall only be undertaken over the plant nappy, at the designated refuelling point, adjacent to the Fuel, Oil & COSHH storage area, as illustrated on dwg. nos. TBC and TBC (see Appendix D).

Refuelling of other generators (that cannot be taken to the refuelling point) shall also be undertaken over a plant nappy, using Gerry cans fitted with anti-spill delivery nozzles and funnels.

Any spillages (however minor) shall be contained and absorbed using the spill kit and shall then be reported to the Site Project Manager (for record keeping and escalation, as appropriate to the Emergency Incident Response Procedure, below).

The spill kit shall then be replenished as appropriate and used materials disposed of a Hazardous Waste.

4.9 Emergency Environmental Incident Response

Spill kits shall be always available within the site compound and within larger items of plant. Spill kits shall be sized and specified as appropriate to the size and type of plant and equipment (e.g. capable of dealing with fuel, oil and other vehicle fluids).

In the event of any actual (or a 'near miss') of silt, concrete or other materials running off to the watercourse, of the spillage or leak of fuel, oil or any type of liquid COSHH material, the following actions shall be implemented immediately:

1. STOP the activity/source of the pollutant (wherever possible);
2. CONTAIN the pollutant. Divert larger flow paths away from any drains and watercourses (e.g. by forming bunds with available aggregates). For fuels, oils or other liquid COSHH materials, absorb and clean up with spill kit materials, putting all used materials and contaminated soil into Hazardous Waste containment. Disposal of any Hazardous Wastes shall be arranged between the Site Manager and the Environmental Manager;
3. REPORT the incident (within 30 minutes of incident occurring) to the Site, Environmental and SHEQ Managers, who shall then escalate the incident internally and to UU, as per the Environmental Incident Escalation & Reporting Procedure and as per requirements of S08 Section 3.

The Environmental Incident Escalation & Reporting Procedure can be found in Appendix F. A hard copy of this document shall be printed and posted on the Site Office and Welfare boards for quick reference.

5. APPENDICES

A. UU S08 Compliance Checklist
B. Environmental Aspects Risk Assessment
C. Environmental Management Drawings
D. Toolbox Talks for Key Environmental Risks
E. Emergency Response Procedure
F. Environmental Policies
G. EHO Pre-Start Notification
H. Task-specific RAMS
I. Planning Consent
J. Environmental Survey Reports

APPENDIX A:

UU S08 Compliance Checklist

APPENDIX B:

Environmental Aspects Risk Assessment

APPENDIX C:

Environmental Management Drawings

APPENDIX D:

Toolbox Talks for Key Environmental Risks

APPENDIX E:

Environmental Incident Reporting Procedure

APPENDIX F:

Company Environmental Policies

APPENDIX G:

EHO Pre-Start Notification

APPENDIX H:

Task-specific RAMS

APPENDIX I:

Planning Approval Documents

APPENDIX J:

Environmental Survey Reports