

Environmental Management Plan (EMP) – PEP Part 3

CONSTRUCTION PHASE

Environmental Management

Morgan Sindall business unit / region:		Cardiff	
Project name:		Pen Y Dre Comprehensive School	
Project no.:		26Z006	
Customer:		Merthyr Tydfil County Borough Council	
Location:			
Revision no.:	003	Date:	06.11.24

For full revision schedule see section one Project Execution Plan (PEP) (Part 1).

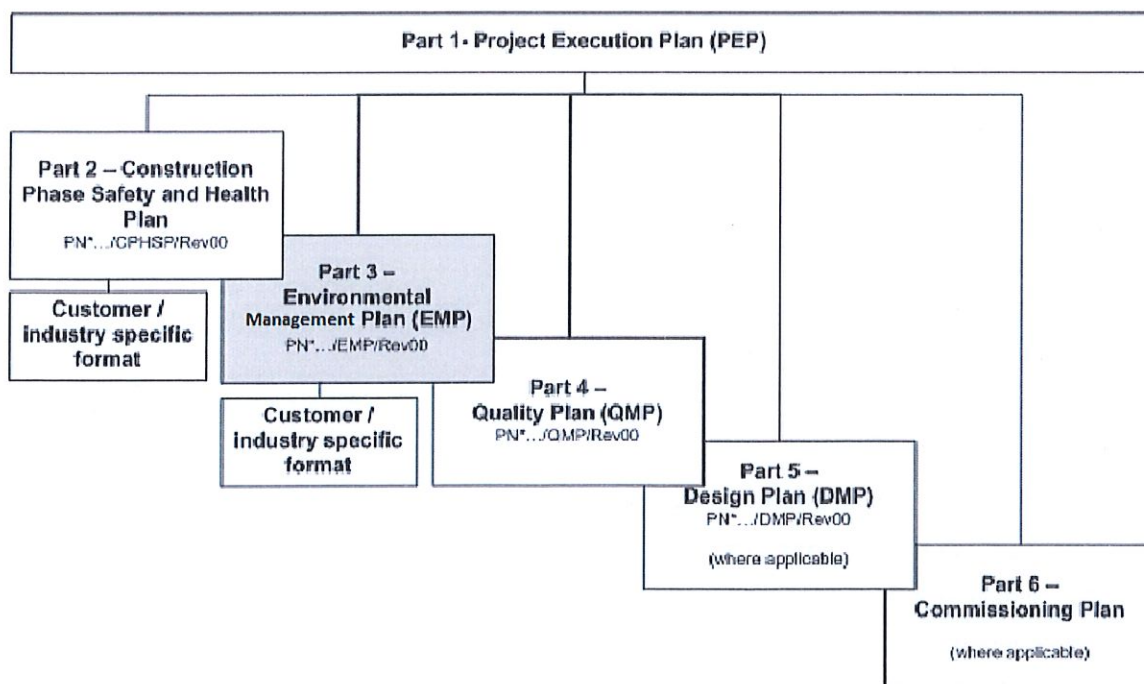
Environment Management Plan (EMP) - Overview

This document defines how specific environmental management elements of the contract are being delivered.

Each box represents the sections of the whole PEP. Only in exceptional circumstances will a PEP consist of less than four documents.

* PN = Contract or project no.

(Update revision nos. as required)



Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	1 of 37

Environmental Management Plan (EMP) – PEP Part 3

Contents

1. Introduction.....	4
1.1. Pre-amble.....	4
1.2. Contract environmental plan	4
1.3. Authorisation	4
2. Environmental Management	4
2.1. Environmental aspects and effects	4
2.2. Objectives and targets.....	4
2.3. Roles and responsibilities.....	5
2.4. Training.....	5
2.5. Communication	5
2.6. Environmental incident and emergency controls	5
2.7. Auditing.....	6
2.8. Monitoring.....	6
2.9. Records	6
2.10. Carbon accounting.....	7
2.11. Carbon and Social Value	7
2.12. Water management.....	7
3. Operational and project specific controls	7
3.1. Site set up	8
3.2. Housekeeping - litter	8
3.3. Traffic management plan.....	8
3.4. Mud and dust control.....	8
3.5. Noise control	8
3.6. Plant emission control	9
3.7. Air Quality and Social Value.....	9
3.8. Water management plan.....	9
3.9. Water Management and Social Value.....	9
3.10. Site drainage	9
3.11. Pumping from excavations.....	10
3.12. Storage of fuels, oils and COSHH materials.....	10
3.13. Resource and energy management.....	10
3.14. Contaminated land	10
3.15. Waste management.....	10
3.16. Wastes from road sweepers	11
3.17. Ecology and biodiversity	11

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	2 of 37

Environmental Management Plan (EMP) – PEP Part 3

3.18. Biodiversity and Social Value..... 12

3.19. Subcontractors 12

3.20. Incidents and emergencies 12

3.21. Incident reporting and investigation 12

3.22. BREEAM / CEEQUAL / CCS / other registrations 13

4. Register of environmental effects..... 14

5. Environmental Consents and Pre-Notification Checklist..... 25

6. Company objectives and targets..... 36

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	3 of 37

Environmental Management Plan (EMP) – PEP Part 3

1. Introduction

1.1. Pre-amble

The following information is contained within PEP Part 1

- Pre-construction information
- Project directory
- Contract organisation and staff responsibilities
- Communications
- Risk management
- Knowledge transfer – good practice / lessons learnt.

1.2. Contract environmental plan

This EMP describes how environmental aspects of the contract are to be managed. It is a live document that is to be reviewed at regular intervals, at least bi-annually, by the project manager to reflect progress of the works and changes in environmental requirements.

It conforms to Morgan Sindall's SHE and responsibly business policies which will be clearly displayed in site offices.

It identifies those aspects of site activities with potentially significant effects on the environment and the controls in place to mitigate those effects. Subcontract works supervised by Morgan Sindall's project team are also subject to this EMP.

Morgan Sindall is certified to ISO 14001: 2015.

1.3. Authorisation

This EMP is authorised when the preparation, approval, authorisation and distribution section on the front cover of the PEP – Part 1 is completed.

2. Environmental Management

Morgan Sindall has a series of standards and guidance that supplement this EMP. Please visit the iMS, available through Digest.

2.1. Environmental aspects and effects

The project manager in line with the contract environmental advisor is to ensure that the register of environmental effects (SE FRM 1), specific to the project is completed before works begin and updated as circumstances occur, such as a change in scope, or a change in Morgan Sindall customer or legislative requirements. Note any legislative requirements in the register. The input of designers at pre-handover meetings will also be considered in developing the register.

It may be necessary to complete pre-start environmental surveys and record the details (SE FRM10).

Legislative requirements should be assessed with reference to specific site conditions and requirements. The project environmental advisor is to advise on specific legal provisions. Additional checks can be made against the technical index, business environmental updates or in consultation with Head of Environment. A record of the assessment shall be maintained (SE FRM 6).

2.2. Objectives and targets

Morgan Sindall will develop contract specific objectives and targets that take into account:

- Morgan Sindall's Responsible Business and SHE functional strategies
- The environmental section of the Morgan Sindall Social Value Bank
- Customer Key Performance Indicators (KPIs) and other requirements.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	4 of 37

Environmental Management Plan (EMP) – PEP Part 3

The contract manager is to ensure that monitoring against the objectives and targets takes place and that the contract's senior management team in consultation with the contract environmental adviser reviews them periodically, generally not less than annually.

2.3. Roles and responsibilities

Good environmental practice will be achieved through the appointment of an environmental advisor for the contract. Specific environmental roles and responsibilities are described in other parts of this plan as well as in job descriptions.

2.4. Training

Training is to be given in accordance with the company's personnel development and training processes, operated at corporate level by HR. Further training will be given as identified in the contract specific training plan. Requests for training personnel on the contract will be coordinated by the project management team. Typically,

- All project operatives and supervisory staff will receive a contract induction that covers environmental issues and their roles and responsibilities including environment
- More detailed training, such as that required for waste management plans, will be given to staff as identified in the contract training plan
- Training on specific environmental topics will be given by suitably qualified personnel. This may be the contract environmental adviser.

Site supervisors and engineers will give tool box talks to operatives on key issues such as spill response and waste management, drawing upon the full site of Toolbox Talk's (TBT's) (SE GUID11) as relevant to the project condition.

2.5. Communication

Environmental information will be delivered to contract personnel in the following way:

- Including environmental issues as an agenda item on project progress meetings
- Inductions, topic-specific training, tool box talks
- Posting information on notice boards
- Monthly cascade briefings
- Morgan Sindall magazine
- Morgan Sindall intranet.

Additionally, within the contract, information will be communicated through:

- SHEQ meetings
- Supply chain meetings
- Other meetings e.g. design team meeting, team meetings, client meetings

Where contact is made with any regulatory authorities, the SHEQ department will be informed and records will be entered onto SHEQ Tracker.

In line with the Morgan Sindall responsible business requirements, all contracts are to be registered with the Considerate Constructors Scheme (CCS), subject to permitted exception.

Complaints and compliments will also be recorded on SHEQ Tracker and resolved particularly when from regulators, the public and customers.

2.6. Environmental incident and emergency controls

Control measures to prevent and control environmental incidents and emergencies on sites are referenced in the register of environmental effects and detailed in site emergency plans.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	5 of 37

Environmental Management Plan (EMP) – PEP Part 3

Generally, pollution prevention will be achieved by adequate training, by the provision of containment measures such as drip trays, absorbent mats or materials, drain covers for preventing impact on sewers or watercourses and by complying with safe working methods.

Adequate and appropriately placed spill kits will be provided for rapid incident response when and where prevention fails. Incidents and emergencies will be reported in accordance with Morgan Sindall's and the customer's procedures.

Regular drills (either practical or desk top) shall be conducted and recorded to maintain competency levels of site personnel and adequacy of response plans.

An environmental emergency drill and record of same will be completed, within the first three months of a project and repeated at least annually thereafter.

2.7. Auditing

Audits will be carried out to check compliance with requirements and to ensure good site practices are in place. They may include

- Customer
- External – third party assessors to Morgan Sindall, British Standards Institute (BSI)
- Internal.

Internal audits may be conducted by the contract environmental adviser or by competent personnel from other Morgan Sindall business units / regions. In line with any audit programme and plans, system compliance audits will be conducted or as directed by the Head of Internal Audit, the Head of Environment, and the SHEQ Assurance and Development Manager. The contract manager is responsible for ensuring that any non-conformances arising are closed out as soon as is practicable within the time frame specified. Close out will confirmed by the auditor.

2.8. Monitoring

The Project Manager will be responsible for environmental inspections at site level to record on the company's Intranet database SHEQ Tracker. Inspections may be carried out by the contract health and safety advisor.

Environmental performance at site level will be regularly monitored during weekly inspections carried out by delegated site personnel.

All monitoring equipment should undergo periodic maintenance checks to ensure efficient and accurate monitoring. This process should be included in the Planned Preventative Maintenance Scheme.

Consents and other permissions

The project must follow SE STD6 and this must be read in conjunction with Environmental Consents and Permitting Guidance (SE GUID6), Environmental Consents and Pre-Notification Checklist (SE FRM6) and Consent Application Authorisation (SE FRM16). The checklist must be completed at tender stage, checked prior to start on site and forms part of this environmental management plan. Where there is any ambiguity, advice should be sought from the relevant Environmental Advisor.

Weekly environmental inspection check lists are completed by site management.

2.9. Records

Environmental records will include

- Inspections
- Site visit records (by others)
- Internal and external audit reports
- Waste management records and plans

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	6 of 37

Environmental Management Plan (EMP) – PEP Part 3

- Sub-project waste management plans
- Minutes of progress meetings
- Correspondence including complaints and regulatory units
- Incident and investigation reports
- Permits, licences and consents
- Environmental data e.g. recycled aggregates, sustainable timber, etc.

All records are kept within site folders or on SIMS.

2.10. Carbon accounting

Requirements of the legal Carbon Reduction Commitment (CRC) necessitate the recording of energy consumption specifically gas and electricity consumption. Nonetheless, as a minimum the following fuel uses will be recorded (where appropriate to do so and where information is available and/or not recorded elsewhere):

- Electricity (direct purchase) kWh
- Electricity (customer supply) kWh
- Diesel consumption (generators) litre
- Diesel consumption (all other uses) litre
- Gas consumption kWh
- Other power sources if needed e.g. renewable.

In line with general requirements of Morgan Sindall, measures such as delivery miles, commuting mileage, car-share mileage, etc. will also be recorded.

2.11. Carbon and Social Value

Where the project is participating the Morgan Sindall Social Value Bank it is a requirement to select one of four options to contribute to Social Value. These are:

- Bronze – Undertake a carbon footprint of the project you are constructing
- Silver – where there is a design influence undertake a complete life cycle analysis of the scheme.
- Gold – Promote the lowest carbon option
- Platinum – Projects to influence their subcontractors and suppliers to report their Green House Gases via a credible reporting platform

Net zero carbon project.

Further guidance can be found in SE GUID14.

2.12. Water management

The quantity of potable water supplied to the project shall be monitored and recorded (in SHEQ Tracker). Where practicable and appropriate, water conservation devices and practices shall be put in place.

3. Operational and project specific controls

The following sections describe minimum controls. Site specific controls to be implemented by the site team will be detailed in the register of environmental effects and supporting method statements and risk assessments.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	7 of 37

Environmental Management Plan (EMP) – PEP Part 3

3.1. Site set up

Selection and establishment of site compounds shall be undertaken mindful of site sensitivity, security, neighbours, storage and handling of chemicals (spill prevention), materials storage needs, drainage, vehicle access including employee commuting needs and nuisance potential, planning constraints, etc.

Site compounds, storage and construction areas will be fenced or have barriers to delimit areas of operation and separate them from other occupied work sites. Where appropriate, sub-project site plans will show site establishment and the locations of environmental facilities such as fuel tanks, spill kits and waste bins.

Site cabin heating is ran by the GAIA system for efficiency and cost effective measures.

3.2. Housekeeping - litter

Adequate waste bins will be placed in work areas, storage areas and temporary site compounds for the depositing of work-related waste and mixed welfare wastes.

Regular inspections will be carried out to monitor housekeeping and initiate action to clear litter and debris.

Personnel are encouraged to avoid littering and to clear litter where it occurs within site boundaries.

3.3. Traffic management plan

A traffic management plan shall be developed for the project detailing deliveries, including abnormal loads, regular commuting, public transport options, parking, restrictions detailed in any local planning agreement or Section 61 consent, out of hours working and with the view to minimising local congestion and impact on local roads (CPHSP Appendix F).

TMP's are updated as and when required to suit the project demands.

3.4. Mud and dust control

Wind-blown dust, generated from dry, exposed ground or soil and wastes stockpiles, will be prevented generally with the use of water sprays. Surfaces and stockpiles will be damped down to minimise dust as necessary.

In wetter conditions, deposits of mud on roads, pavements and areas of hard standing may need to be cleared. Installation of wheel washing devices may be required, preferably with water recycling equipment. Small occurrences will be cleared manually with a broom and shovel; elsewhere road sweepers will be called upon. The need to control mud and dust is covered in site inductions and in relevant task risk assessments, method statements and briefings.

A road sweep / mud management controls are regularly in place and dust control TBT's are continuously given to subcontractors / encouragement of the correct PPE to be worn / extraction in place.

3.5. Noise control

Site works located in residential and other locations can create noise nuisance to neighbours and the general public, as well as posing an occupational risk. The presence of sensitive receptors will be identified and recorded on the register of environmental effects and the necessary control measures implemented.

In some instances, ambient baseline noise surveys will be carried out for comparison with noise levels during the works. If increases in noise are considered excessive, control measures will be adopted. Where possible noisy operations must be programmed for times when the least perceived nuisance will occur.

Contact will be made with neighbours likely to be affected by construction works informing them about the works and what mitigation measures have been implemented to reduce nuisance and disruption as much as practically feasible. Negotiation with local authorities may be required to establish and manage Control of Pollution Act Notices (S60 / S61).

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	8 of 37

Environmental Management Plan (EMP) – PEP Part 3

Due to the nature of the project residing within a live area, the Client will also advise when noise will be required to be lowered / minimised to work alongside the end-user, upon a Client instruction. This will include timing of operations, exam down-times and any other requests from MTCBC / AECOM.

3.6. Plant emission control

Where feasible, electric plant will be used in preference to diesel- or petrol-powered units.

No plant will be allowed to idle when not in use. Plant operators are encouraged to switch off as soon as practically sensible.

Evidence of poor plant maintenance, such as black exhaust fumes, will be monitored by supervisory staff on a continuing basis. Plant with unacceptable performance is prohibited from work until rectified or replaced. Plant will be routinely inspected in line with prescribed requirements including emissions as well as leaks and drops.

Hybrid machines used where possible on-site and currently in place with the inclusion of fume extraction.

3.7. Air Quality and Social Value

Where the project is participating in the Morgan Sindall Social Value Bank it is a requirement to select one of four options to contribute to Social Value. These are:

- Bronze – 3+ air quality improvement techniques employed on site
- Silver – 5+ air quality improvement techniques employed on site
- Gold – 7+ air quality improvement techniques employed on site
- Platinum – 10+ air quality improvement techniques employed on site

Further guidance can be found in SE GUID13.

3.8. Water management plan

Where there is risk of impact on controlled waters, a water management plan shall be developed setting out project specific controls for the management of any controlled or other waters during construction phase.

The plan shall include detail of regular inspection, sampling and contingency in the event of equipment failure, fire or another emergency.

3.9. Water Management and Social Value

Where the project is participating the Morgan Sindall Social Value Bank it is a requirement to select one of four options to contribute to Social Value. These are:

- Bronze – 3+ water management techniques employed on site
- Silver – 5+ water management techniques employed on site
- Gold – 7+ water management techniques employed on site

Further guidance can be found in SE GUID15.

3.10. Site drainage

Drainage systems can act as rapid pathways for the spread of pollutants. Small quantities of pollutants such as oil can spread over large areas and cause significant harm.

Both storm and foul drainage systems should be identified and shown on plans. It is good practice to colour code drain covers; surface water – blue, foul water - red and combined – red.

Interceptors and cut-off valves, and other pollution control equipment must be maintained, inspected and clearly identified.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	9 of 37

Environmental Management Plan (EMP) – PEP Part 3

3.11. Pumping from excavations

Greater or lesser quantities of surface and ground waters that occasionally require to be cleared from excavations and exposed surfaces will be discharged to sewer, to land or to controlled waters either directly or indirectly via minor drainage systems. The need for approvals or consents will be determined on a case-by-case basis. Priorities will be to prevent

- i. Ingress of surface waters
- ii. As far as is practical, disturbance to clean waters needing to be cleared from excavations and exposed surfaces.

Generally, discharges to sewers will require the consent of the relevant statutory undertaker. If necessary, silty water will be passed through a settlement tank of appropriate capacity before discharge to the receiving medium.

Water known to be contaminated with hydrocarbons or other hazardous substances will be handled in accordance with specific risk assessments and method statements (RAMS).

Pumping operations and working in waters lead to the largest number of environmental incidents for the construction industry. Control measures must include detailed requirements being set out in risk assessments and method statements as well as use of the "permit to pump" system.

3.12. Storage of fuels, oils and COSHH materials

Fuels, oils, paints, solvents and other Control of Substances Hazardous to Health (COSHH) materials will be kept in lockable containers, with controlled access to keys, and in line with legal requirements e.g. oil storage regulations, 110% bunding, use of drip trays, etc.

Fuelling operations will be planned to minimise the risk of spillage and environmental risk. This may be the subject of a specific plan for high-risk operations and sensitive areas.

Storage of fuels / oils are within a segregated area and COSHH materials are kept separate. Spill kits are provided on-site and regularly replenished and monitored for any defects or products misused.

3.13. Resource and energy management

In line with Morgan Sindall strategy, the contract will plan and carry out operations with due regard to energy (CO₂e emissions), as well as resource efficiency, e.g. efficiency using WRAP or Cl:aire protocols, storage of materials, delivery management, etc.

3.14. Contaminated land

Contaminated land identified prior to or during the contract will be managed in line with Morgan Sindall standards and guidance.

A contaminated land checklist is available for use on the forms section of the IMS (SE FRM 4).

Contaminated land has been identified around Block 06A and is currently under review by Prichards, as Morgan Sindall are awaiting recommendations from the specialist contractor. This has now been rectified as per the Client's request.

3.15. Waste management

Waste services may be provided by a number of licensed carriers or brokers, transferring wastes to a variety of receiving sites. The selection of services will depend on location, nature of the wastes and the availability of receiving sites. In all cases, the priority is to avoid disposal to landfill wherever possible. The waste hierarchy 'Prevention – reduce – reuse – recover – dispose' must always be implemented (legal requirement).

The validity of waste licences and permits held by carriers and sites of disposal will be checked by reference to the Environment Agency's / Scottish Environment Protection Agency public register.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	10 of 37

Environmental Management Plan (EMP) – PEP Part 3

Hazardous wastes will be either transported by road to the waste hub or disposed of in accordance with waste regulations and approved contractors.

Where sites produce hazardous waste, they will be registered with the Environment Agency. Without a hazardous waste premises number, waste carriers may refuse to remove the waste.

All skips and bins will be closed or sheeted where required to prevent the escape of wind-blown debris.

Duty of care records will be maintained and filed in archives on completion.

A site waste management plan will be maintained and recorded. All projects may consider a SWMP in place irrespective of scale or value. A Morgan Sindall form (SE FRM3) is available to use where other systems such as BRE Smart Waste or WRAP, or customer specific versions are not being used. Details of waste, carriers and disposal sites will be recorded, including evidence of checks made on licences, permits and inspections.

Reconomy to complete all waste management reports and a full MMP has been commissioned.

3.16. Wastes from road sweepers

The volumes of sweeper wastes are small and deemed to be inert. Wastes will either be taken to the operator's normal discharge location, for which there is a valid waste management licence or an exemption or discharged at a location designated by site management.

3.17. Ecology and biodiversity

Protection and enhancement of biodiversity and ecology is a legal requirement. Plans should be developed, if not already in place at tender stage, to conduct pre-construction surveys, and during construction phase to continue monitoring for protected and/or invasive species.

Specific ecological and biodiversity risk assessments will be completed as part of normal completion of the Register of Environmental Effects, and where mitigation measures are required; they shall be detailed either below or in site-specific plans.

It is expected that projects of over £1m in value will complete the risk assessment (Register of effects) with specific focus on biodiversity and ecology, record its completion on Tracker and establish mitigation and control plans where required. (Smaller projects should focus on biodiversity and ecology where there is a direct project need.)

Project specific issues

Biodiversity and ecological sensitive areas have been identified at **Goetre PV location, full ecology survey has been commissioned and further surveys are required**

The site itself contains or has the potential to contain –

- Trees
- Watercourse – river, stream, pond
- Nesting birds
- Protected species – bats, amphibians and insects
- Etc.

Project potential impact

The potential effects upon the existing biodiversity on this project are – **demolition in accordance with bat surveys, planned watch and brief will be required for Phase 02 works in removal's of the fascia's – this will be led by Ecological Services, as per recommendations.**

- Removal of trees
- Removal of grassland
- Removal of scrub
- Removal of hedgerow
- Relocation of reptiles, amphibians,
- Etc.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	11 of 37

Environmental Management Plan (EMP) – PEP Part 3

Project Specific mitigation

To minimise the effects of this construction project or to mitigate for unavoidable effects upon the local biodiversity the project team will consider all opportunities to improve biodiversity. These may include:

- Improving the immediate habitat through landscaping and planting of native trees and shrubs
- Consider build design to incorporate habitat or features to accommodate local species – bat access bricks, bird nest boxes, ponds, etc.
- Consider inclusion of additional features not in design – bird tables, insect hotel, etc.
- Consider off-site local enhancements in conjunction with local wildlife groups, etc.

Responsibilities

The Project/Site Manager is responsible for the implementation of this Biodiversity Plan. The PM/SM shall communicate all management techniques to relevant subcontractors during site specific inductions.

If protected species are encountered during the project, the sighting should be recorded and forwarded on to the local Biodiversity Records Centre.

3.18. Biodiversity and Social Value

Where the project is participating the Morgan Sindall Social Value Bank it is a requirement to select one of four options to contribute to Social Value. These are:

- Bronze – compliance with the Morgan Sindall Group Biodiversity Position Statement
- Silver – provide enhancements for wildlife involving the local community
- Gold – undertake a volunteering project with a local Wildlife Trust of Wild Fowl and Wetlands Trust
- Platinum – leave a net gain in biodiversity on the project

Further guidance can be found in SE GUID16

3.19. Subcontractors

Subcontractors and suppliers are required to comply with the EMP in its entirety. Site inductions, toolbox talks, training and task briefings will be given to all site personnel with relevant information from the EMP.

This EMP will be provided to subcontractors, along with the contract specific environmental details, where their works package can have a potential detrimental impact on the environment. Subcontractors will be required to develop their own environmental plans specific to work packages where appropriate and to comply with the content and direction of this and other applicable supporting documentation.

Prior to commencement of works on-site all subcontractors sign up to an agreement within their orders.

3.20. Incidents and emergencies

Actions in response to environmental incidents and emergencies will be communicated at inductions and task briefings. Spill response posters will be displayed on office and welfare facility notice boards.

Site plans showing the locations of spill kits and waste facilities, in addition to the locations of health and safety facilities, will be available on site office and welfare cabin notice boards. Plans will include the names of personnel with specific environmental responsibilities, and actions to be taken. Cross reference will be made to contingency planning requirements.

3.21. Incident reporting and investigation

Incidents are to be reported through the management hierarchy as soon as practically possible after they have been identified. Site management will assess the significance of the incident and determine the level of investigation. All incidents must be reported to the SHEQ department and entered onto SHEQ Tracker.

All accidents and incidents are reported onto Eco Online and reported to the MS SHEQ department.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	12 of 37

Environmental Management Plan (EMP) – PEP Part 3

3.22. BREEAM / CEEQUAL / CCS / other registrations

Where customer requirements specify the project may need to register with BRE Environmental Assessment Method (BREEAM), Civil Engineering Environmental Quality Assessment (CEEQUAL), DREAM, etc. such registrations should be completed in a timely manner and responsibility allocated to a project individual to manage the relevant processes, registrations, filing, document collection, etc. and to facilitate audits and site inspections where required.

All projects are required under the terms of the company Associate Membership to register with the CCS, other than for very short duration projects (typically less than six weeks).

Regular visits from CCS, the last score achieving 50/50 and within BREEAM requirements.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	13 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

4. Register of environmental effects

Office / depot / site:	Pen Y Dre Comprehensive School	Prepared by:	Alex Smith	Date	06.11.24
Assisted by:	Ree Amroota				
		Reviewed by:	Alex Smith / Ree Amroota	Date	06.11.24
NOTES					

In the table below, under Environmental Impacts, assess levels of impact significance for each Development Activity and Aspect, as L, M or H, in accordance with following risk matrix. Mitigation measures are required where significance of impact is assessed as M or H.

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Assessment of Significance

Likelihood of Activity resulting in impact.	Severity of Subsequent Impact				
	Low (1)	Moderate (2)	Moderate (3)	High (4)	High (5)
Negligible (1)	Low (1)	Low (2)	Low (3)	Low (4)	Low (5)
Unlikely (2)	Low (2)	Low (4)	Moderate (6)	Moderate (8)	Moderate (10)
Unlikely (3)	Low (3)	Moderate (6)	Moderate (9)	Moderate (12)	Moderate (15)
Likely (4)	Low (4)	Moderate (8)	Moderate (12)	High (16)	High (20)
Likely (5)	Low (5)	Moderate (10)	Moderate (15)	High (20)	High (25)
Certain (6)	Moderate (6)	Moderate (12)	High (18)	High (24)	High (30)

Definitions:

Activity: generic definition relating to works being completed and medium that may be impacted

Aspect: element of an activity that can interact with the environment

Impact: any change to the environment, whether adverse or beneficial, wholly or partially resulting from an aspect

Likelihood: the chance or probability of an event occurring. Negligible – rare, occurs less than 0.1% of the time/case through to Certain – almost inevitable, 99.9% chance of occurrence

Severity: the impact that an event might have on the environment. Low – minor in inconsequential impact with no or short-term duration through to High - major impact or destruction to the environment with potential long-term consequence.

Significance: the product of likelihood and severity according to the above table.

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	15 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Guidance**Likelihood of an Environmental Impact Occurring**

Likelihood	Description	L Score
Certain	Occurs repeatedly / event 'only to be expected'	6
Likely	'No surprise' / will occur several times	5
Likely	Could occur sometimes	4
Unlikely	Unlikely, though conceivable	3
Unlikely	So unlikely that probability is close to zero	2
Negligible	Not going to occur	1

Environmental Consequences of an Impact Occurring

Consequence	Description of environmental impact	C Score
High	Major damage on & off site, national reputation damage, prosecution inevitable	5
High	Considerable environmental damage, prosecution and national reputation damage likely	4
Moderate	Moderate impact, contamination or damage recoverable, local reputation damage, prosecution possible	3
Moderate	Slight impact, small scale event contained on site, possible local media interest, prosecution unlikely	2
Low	No measurable environmental consequence, no reputation damage, zero likelihood of prosecution	1

Risk Rating Categories

Risk Rating	Action to be taken
High (16-30)	Work can only continue if control measures reduce the risk rating to an acceptable level
Moderate (6-15)	Introduce control measures to reduce risk as low as reasonably practicable
Low (1-5)	Risk broadly acceptable, but situation needs to be monitored for changes and action to reduce risk

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	16 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
			1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High		
Works associated with office operations	Operation of air-conditioning and refrigerant units containing ozone depleting substances	Escape of gases and impact associated with ozone layer and climate change.	1	1	1		
Works affecting Water resources	Abstraction of surface or groundwater	Deterioration in water resource quantity and quality	4	2	6		
	Dewatering of surface or groundwater	Deterioration in water resource quantity and quality	4	2	6		
	Impoundment of watercourses	Deterioration in water resource quantity and quality	1	1	1		
	Discharge of effluent	Deterioration in water resource quality	1	1	1		
	Discharge of site drainage	Deterioration in water resource quality	4	2	6		
	Discharge of foul drainage	Deterioration in water resource quality	1	3	2		
	Physical (temp and perm) works to watercourses and Rivers	Deterioration in water resource quality	4	2	6		
	Physical (temp and perm) works to watercourses and Rivers	Change in flow regime	4	2	6		

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	17 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
	1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High				
	Physical (temp and perm) works to watercourses and Rivers	Loss of Biodiversity	1	3	1		
	Physical (temp and perm) works to flood defence works	Deterioration in water resource quantity and quality	1	1	1		
	Physical (temp and perm) works to estuaries	Deterioration in water resource quantity and quality	1	1	1		
	Spillages of hazardous substances	Deterioration in water resource quantity and quality	3	3	4		
	Use and Storage of Construction Hazardous substances including Oils/ Diesels and Petroleum	Deterioration in water resource quality	4	3	6		
	Use and Storage of Process Commissioning Hazardous substances	Deterioration in water resource quality	4	3	6		
	Concrete Washout	Deterioration in water resource quality	4	3	6		
	Use of potable water	Deterioration in water resource quality	1	1	1		
	Works affecting Ecological Important Habitat	Loss of biodiversity	4	2	6	Biodiversity and ecological	

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	18 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
			1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High		
Works affecting Ecological Habitat and Species						controls as detailed in PEP	
(Note: completing this risk assessment and including mitigation measures and controls within the project environmental plan (PEP) will address the Planet target on biodiversity.	Works removing Ecological Important Habitat	Loss of biodiversity	N/A	N/A	N/A	Biodiversity and ecological controls as detailed in PEP	PV and ecology impact to be confirmed
	Works affecting ecological protected species	Loss of biodiversity	N/A	N/A	N/A	Biodiversity and ecological controls as detailed in PEP	
	Works removing ecological protected species	Loss of biodiversity	N/A	N/A	N/A	Biodiversity and ecological controls as detailed in PEP	
	Works affecting invasive plants	Land contamination by non-native species	N/A	N/A	N/A	Biodiversity and ecological controls as detailed in PEP	

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	19 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
			1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High		
						detailed in PEP	
	Works removing invasive plants	Land contamination by non-native species	N/A	N/A	N/A	Biodiversity and ecological controls as detailed in PEP	
Works affecting historic (e.g. listed) or archaeological important sites and structures	Direct impact	Loss of historic/archaeological value	N/A	N/A	N/A		
	Near area	Loss of historic/archaeological value Subsidence vibration	N/A	N/A	N/A		
	Adjacent to area	Encroachment	N/A	N/A	N/A		
Working on and disturbance of contaminated land	Physical disturbance	Potential spread of contaminated land and pollution	N/A	N/A	N/A		
	Disposal	Potential spread of contaminated land and pollution	N/A	N/A	N/A		

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	20 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
General construction activities that may lead to Nuisance	Mud on road	Nuisance to local population	4	3	6		
	Atmospheric emissions	Nuisance to local population	4	3	6		
	Construction dust	Nuisance to local population	4	3	6		
	Batching dust and silo emissions	Nuisance to local population	2	3	5		
	Process atmospheric emissions	Nuisance to local population	3	3	5		
	Noise emissions	Nuisance to local population	4	3	6		
	Light emissions	Nuisance to local population	2	2	2		
	Vibration	Nuisance to local population	4	3	6		
	Odour emissions	Nuisance to local population	3	2	3		
	Road congestion	Nuisance to local population	3	2	3		

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	21 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
			1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High		
	Other public rights of way	Loss of amenity value Disruption	4	3	6		
	Visual amenity	Loss of amenity value	2	2	2		
	Unsociable working hours	Nuisance to local population	4	3	6		
Works requiring the consumption of Energy and/or fossil fuels	Energy consumption/carbon management - Construction works	Direct: cost Indirect: atmospheric emissions Resource depletion	3	3	3		
	Energy consumption/carbon management - Site accommodation	Direct: cost Indirect: atmospheric emissions Resource depletion	3	3	3		
	Energy consumption/carbon management - Transport and logistics	Direct: cost Indirect: atmospheric emissions Resource depletion	4	3	6		
	Energy consumption/carbon management - Material selection (embodied energy)	Direct: cost Indirect: atmospheric emissions	4	3	6		
Document Reference	SE PLN 01	Process Parent	Revision Status	Document Owner	Date	Page	
		PM PR	Rev 1	Jane King	Jan 2	22 of 37	

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
			1 - Negligible 2-3 - Unlikely 4-5 - Likely 6 - Certain	1-2 - Low 2-3 - Moderate 4-5 - High	1-5 - Low 6-15 - Moderate 16-30 - High		
		Resource depletion					
	Energy consumption / carbon management – generation of on-site power	Direct: cost Indirect: atmospheric emissions Resource depletion	3	4	6		
	Delivery and handling (transfer) of fuels (liquid or gas)	Direct pollution through spills, etc. Waste of resource and cost	3	4	6		
Works leading to the generation of Waste	Material storage and damage	Direct: cost Indirect: reduced sustainability	3	3	3		
	Creation of litter	Nuisance	3	1	1		
	Waste disposal (duty of care) Construction waste Sewage M&E decommissioning waste, etc.	Contamination Nuisance Pollution Legal compliance	2	1	1		
	Surplus excavation/aggregate disposal	Increased cost Reduced sustainability	4	6	3		
	Packaging waste	Increased cost of disposal Depletion of resources	3	3	3		

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	23 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Activity	Aspect	Impact	Impact Significance			Control and Mitigation	Residual Impact Significance
			Likelihood	Severity	Resulting Significance		
Works in sensitive location or where abnormal operating conditions arise e.g. Emergency response	Abnormal operating conditions e.g. pumping, filtration, water treatment, etc.	Pollution of environment Legal sanction	2	2	2		
	Unplanned event (Incidents e.g. spill, fire, etc.)	Pollution of environment Legal sanction	4	3	6		

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	24 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

5. Environmental Consents and Pre-Notification Checklist

Contract no:	26Z006	Contract name:	Pen Y Dre Comprehensive School	Completed by:	Ree Amroota / Alex Smith	Date:	25.07.22
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Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Water resources									
Permit to discharge water to a watercourse	Effluent discharges of 5 to 20 cubic meters per day to a point source; i.e. pipe, outfall or soak-away, that enters directly or indirectly controlled waters. Any discharges exceeding 100 cubic meters per day will need to apply for a bespoke permit. Unless within 200m of a watercourse, then any discharges exceeding 50 cubic metres per day will need to apply for a bespoke permit.	EA – approx four months SEPA: Registration – one month License – approx. four months	EA	NRW	SEPA	No			
Consent to discharge waste water to a Sewer	Consent or approval for discharge of effluent to sewer.	Two months	Water Company	Water Company	Water Company	No			
S165 consent for temporary discharge from a pipe less than 229mm	Temporary consent to discharge to surface water from a pipe less than 229mm (9") or when the EA request a formal application. Application via water company	EA – Seven working days SEPA – Seven working days	EA	NRW	SEPA	No			
S166 consent for temporary discharge from a pipe larger than 229mm	Temporary consent to discharge to surface water from a pipe greater than 229mm (9") or when the EA request a formal application.	EA Seven - working days SEPA – Seven working days	EA	NRW	SEPA	No			
Abstraction licence	Abstraction of water from a controlled water resource	EA: four - six months	EA	NRW	SEPA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	25 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
	Note: some dewatering activities will require an abstraction licence. If you plan to abstract more than 20 cubic metres a day from a watercourse or underground water reserve, you will likely need a license. There are exemptions – dewatering of underground strata and abstractions of surface waters to prevent interference with building or engineering works where the abstraction lasts less than 6 consecutive months, subject to restrictions.	SEPA: Registration - one month License – approx. four months							
Notification of removal of water from excavations	Removal of water from the ground or surface water to assist construction or the extraction of aggregates and minerals	N/A	EA	NRW	SEPA	No			
Works in proximity of a watercourse / land drainage / flood risk activity permit	Any temporary or permanent physical works in, adjacent or within 9m, under, or over a watercourse. Standard rules exemptions or bespoke permit.	LA (for ordinary watercourses): EA (for main rivers): two months IDB (where applicable): two months SEPA: registration – one month Licence approx. four months	LA / EA / IDB	LA / NRW	SEPA	No			
Consent to use pesticide in close proximity to a watercourse	Any application of a pesticide (including herbicides, fungicides, insecticides, molluscicides, rodenticides, growth regulators and masonry and timber preservatives) within ten metres of a watercourse, including canal, ditch, river or estuary.	Two months	EA	NRW	SEPA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	26 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Consent to affect bed of an estuary or sea (FEPA consent, in Wales you will also require a Coastal Protection Act consent (CPA))	Any works that may deposit material onto the bed of an estuary or the sea, including cofferdams, erection of jetties, outfall structures	Four - 12 months	MMO	Marine Consents Unit: (MCU) – Welsh Assembly	Marine Scotland Licensing Operations Team – Scottish Executive	No			
River works licence (within River Thames)	Under Section 66 of the Port of London Act, a river works licence is required for any works in the River Thames, riverward of the mean high water mark and regardless of ownership of the river bed, including any works under the river or overhanging the river.	Three months	Port of London Authority	-	-	No			
Dredging licence (within River Thames)	Before any dredging work is undertaken on the tidal Thames it is a statutory requirement that a licence for such works is granted under Section 73 of the Port of London Act 1968 (as amended).	Three months	Port of London Authority	-	-	No			
River works licence (within the Medway Port)	Any works which are to be carried out within the port limit must have a river works licence to ensure that all relevant consultations have been carried out and that there are no adverse effects on the safety of navigation within the port.	Three months	Peel Ports Medway	-	-	No			
Dredging licence	Before any dredging work is undertaken within the port of Medway and dredging licence must be approved.	Three months	Peel Ports Medway	-	-	No			
Installation of water fitting	Installation of new water supply e.g. batcher to be consented by water company.	One month	Water Company	Water Company	Water Company	No			
Discharge of hazardous substances and non-hazardous pollutants	Disposal / discharge of effluent containing hazardous substances or non-hazardous pollutants to ground or to surface water which is not covered by a Consent to Discharge.	Three months	EA	NRW	SEPA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	27 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
dangerous substance / groundwater regulations									
Groundwater Source Protection Zone (SPZ).	When working within a Groundwater Source Protection Zone (SPZ), you should contact your local regulator to discuss the work being undertaken. The SPZ is an area designated around a groundwater source, the maximum extent of which is the catchments area for the source and within which the Regulator seeks to limit the processes and activities that can occur within that area.	-	EA	NRW	SEPA	No			
Water Protection Zones (WPZ) Consent	General construction works are exempt but any fixed premises e.g. depots in a WPZ where chemicals are stored will require a consent You must get consent if you store or use: • 200 litres of more of any controlled substance • 50 litres or more of any controlled substance if stored in a single container Controlled substances include fuel and oil, artificial fertilizer, and toxic, harmful or corrosive substances.	Four months	EA	NRW	NA	No			
Piling work within a GWPZ approval	Any piling or penetrative foundation works that are scheduled to take place within a groundwater source protection zone must first be approved by the Environment Agency. A piling risk assessment must be undertaken including contaminated land tests – these can take four weeks to complete.	25 days	EA	NRW	SEPA	No			
CAR License (Complex License)	Management of surface water run-off from a construction site, including access tracks, which: - Is more than 4 hectares	Four months	N/A	N/A	SEPA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	28 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments					
			England	Wales	Scotland									
Dust														
Prescribed processes	- Is in excess of 5km or - Includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°													
	Use of mobile concrete crushers and screens - operator should have a licence from the planning authority local to its head quarters. Where Morgan Sindall own and operate concrete batching plant away from site the batching process may be a prescribed process requiring consent.	Three months 21 days for mobilisation authorisation	Planning Authority	Planning Authority	SEPA / Planning Authority	No								
Noise														
S61 consent (noise and vibration)	S61 consent is only necessary if a planning or development order or the client requires the contractor to enter into the S61 process.	Two months to develop 28 days determination	Planning Authority	Planning Authority	Planning Authority	No								
CRC (energy efficiency scheme) (formerly carbon reduction commitment)														
CRC energy efficiency scheme	Any organisation with at least one half hourly electricity meter settled on the half hourly market must register with CRC. Any organisation which uses less than 6,000Mwh must make an informed disclosure. CRC compliance is Morgan Sindall Group responsibility. Joint ventures must individually assess whether they qualify and must register for CRC energy efficiency scheme with reference to 'A guide to qualification and organisational structure'.	Registration not consent	EA	EA	EA	No								
Document Reference										Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01										PM PRO	Rev 1	Jane King	Jan 2020	29 of 37

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	29 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Energy Savings Opportunities Scheme (ESOS)	Qualifying organisations to undertake energy audits and identify energy savings. ESOS compliance is Morgan Sindall Group responsibility.	Registration not consent	EA	EA	EA	No			
Ozone depleting substances									
F-Gas and ODS regulations qualified person	A qualified person needs to; carry out leak checking, recovery of fluorinated greenhouse gases, install, maintain and service any refrigeration equipment, air conditioning units, equipment containing fluorinated greenhouse gas based solvents, fire protection system, fire extinguisher or H.V switch gear containing more than 3kg of fluorinated greenhouse gas. An individual must be qualified for the relevant activity e.g. H.V switch gear will require a individual holding the H.V switch gear qualification. Qualifications include five day CITB/City and Guild.	Contractor to organise. Morgan Sindall to check qualifications.	EA	NRW	SEPA	No			
Waste Management									
Environmental Permitting Regulations 2009 (England and Wales)	An environmental permit must be gained for a location where waste material requires disposal, storage or treatment on site or where the off site location does not have permitted licences. Any waste management licences in place before 6 April 2008 automatically became Environmental Permits.	Four months	EA	NRW	SEPA (WML)	No			
Waste Management Licence 1994 (Scotland)	The Environmental Permitting Regulations do not apply in Scotland and a Waste Management Licence must still be obtained.								
Waste Exemptions	Environment Permitting Regulations (England and Wales) 2010	Online system in England and Wales.	EA	NRW	SEPA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	30 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
		21 days (Scotland)							
Hazardous Waste Registration	The Hazardous Waste Regulations require any premises in Wales or Scotland that produce or hold hazardous waste in quantities of greater than 500kg to annually register. Note: this requirement in England was removed in April 2016.	Immediate (by phone and/or online)	-	NRW	Not applicable (Use / purchase Special Waste Consignment Notes from SEPA)	Yes	Morgan Sindall		
Ecology									
Control / Removal of Invasive Species	Submission of Invasive Species management plan to EA / SEPA		EA	NRW	SEPA	TBC			
<i>Licence to effect or translocation of protected species or habitats</i>	Where protected species has been identified, a licence may be necessary to undertake mitigation or works in the area.	25 – 60 days	DEFRA English Nature	Welsh Assembly CCW	Scottish Executive SNH	No			
Consent to work in a Site of Special Scientific Interest (SSSI) Special Areas of Conservation, Special Protection Areas, RAMSAR (wetland areas)	Where works will be undertaken in a protected habitat.	Four - six months	Natural England	CCW (CCGW)	SNH or regulatory Authority	No			
Consent to work in a Site of Special Scientific Interest that is also a	Where works would take place in or could affect the integrity of the protected site / or its species then an appropriate assessment may be required.	Four - six months	LPA / DEFRA	LPA / DEFRA	LPA / DEFRA SNH	No			
Document Reference			Process Parent			Revision Status		Document Owner	
SE PLN 01			PM PRO			Rev 1		Jane King	
								Date	
								Jan 2020	
								Page	
								31 of 37	

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Special Area of Conservation, Special Protection Areas or RAMSAR (wetlands)			Natural England	CCW (CCGW)					
Felling licenses	Where more than 5m3 of timber is to be felled per quarter and no detailed planning permission is in place or other exemption applies.	Ten weeks	Forestry Commission	Forestry Commission	Forestry Commission	No			
Archaeology and built heritage									
Listed Building Consent / Conservation Area Consent	Works affecting a listed building / conservation areas including installation of noise insulation and remedial works on structure(s).	One - two months	Planning Authority Historic England	Planning Authority Welsh Assembly	Planning Authority Scottish Executive	No			
Scheduled Ancient Monuments	Works potentially affecting a scheduled ancient monument must be consented by English Heritage.	Three months	Historic England	Historic Wales	Historic Environment Scotland	No			
Works affecting an area of archaeological importance	Where works affect an area where there is evidence and or potential for archaeological remains.	Six weeks	Planning Authority	Planning Authority	Planning Authority	No			
Licence for removing human remains (archaeology)	Where human remains need removing.	One week	Home Office	Home Office	Home Office (Historic Scotland)	No			
Licence which will affect a burial ground	Where works will affect a burial ground.	Three months	Home Office (Church of England)	Home Office	Home Office	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	32 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Planning Permission / Development Order / Act conditions									
Planning Permission onto a classified road		12-16 weeks	Planning Authority	Planning Authority	Planning Authority	Yes	Morgan Sindall	12.07.22	
Planning conditions	Conditions may require certain controls and agreements to be in place and implemented prior to and during the works including demolition / dismantling.	Eight weeks	Planning Authority	Planning Authority	Planning Authority	No			
Development Consent Order		Four - 12 months	Infrastructure Planning Committee	Infrastructure Planning Committee	N/A	No			
EIA Screening/ Scoping	Scoping opinion for EA, as per EIA regulations.	Six weeks (screen) Six weeks (scope)	Planning Authority / MMO	Planning Authority / MMO	Planning Authority / Scottish Executive / MMO	Yes	Morgan Sindall	12.07.22	
Town and Country Planning (Control of Advertisements) (England) Regulations 2007	Restrictions on site signage on hoardings, when in a conservation area.		Planning Authority	-	-	Yes	Morgan Sindall	July 2021	
Town and Country Planning (Section 62A Applications)	When development is within ten metres of railway land (including sidings etc.) there is a requirement to notify the railway infrastructure owner.					No			
EIA and Environmental Statement		Six - 12 months	Planning Authority / DEFRA	Planning Authority / DEFRA	Planning Authority / DEFRA	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	33 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Wayleaves / Easements	For example, where new overhead lines (OHL), cables and pipelines will cross third party land.	Two - Six months	Landowner	Landowner	Landowner	Yes	Morgan Sindall	TBC	DCWW
Land Purchase / leasing	Where additional land is required permanently or temporarily for the works.	Six - 12 months	Landowner	Landowner	Landowner	No			
Lease conditions	Conditions may require certain controls and agreements to be in place and implemented prior to and during the works.	Four weeks	Landlord	Landlord	Landlord	No			
Port Authority consultation	Port Authorities may impose certain controls and require certain agreements to be in place and implemented prior to and during the works.	Four weeks	Port Authority	Port Authority	Port Authority	No			
Public Rights of Way, Roads									
Closure and Diversion of Public Rights of Way and Roads	Temporary / permanent closures or diversions of public rights of way and roads require consent and notification of alterations prior to works commencing.	One - Two months	Planning Authority	Planning Authority	Planning Authority	No			
Closure and Diversion of Trunk Roads of Motorways	Temporary or permanent closures or diversions of trunk roads and motorways require consent and notification of alterations prior to works commencing.	One - two months	Highways England	Welsh Assembly	Scottish Executive	No			
Radioactive Substances									
Licence for the use and storage of radioactive sources	Where on site laboratories or other areas use radioactive sources for measurement etc.	Four - five months	EA	NRW	SEPA	No			
Other									

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PF	Rev 1	Jane King	Jan 2	34 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

Consent name	Description of the works requiring approval	Approx timescale to obtain consent	Enforcement agency			Consent / notification req'd Yes/No	Responsible party for application	Date applied	Consent received/comments
			England	Wales	Scotland				
Considerate Constructors Scheme	Where the project is a non-JV project longer than six weeks duration it is to be registered with the Considerate Constructors Scheme, through Materials Desk.	Immediate online / two weeks	CCS	CCS	CCS	Yes	Morgan Sindall	12.11.11	
CEEQUAL (Civil Engineering Environmental Quality Assessment and Award) Scheme	Where projects are required to complete CEEQUAL assessments. www.ceequal.com	Project duration	CEEQUAL	CEEQUAL	CEEQUAL	No			
BREEAM (Building Research Establishment Environmental Assessment Method)	Where projects are required to complete BREEAM assessments. www.breeam.org	Project duration	BRE	BRE	BRE	No			

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	35 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

6. Company objectives and targets

Project specific environmental objectives and targets. Table given for illustrative purposes only and should be updated on a project-by-project basis.

Improving the Environment					
Carbon emissions: report Scope 1, 2 and 3 carbon emission reductions to science-based targets (SBT)	Reduce Scope 1 and 2 emissions against 2016 baseline	Reduce Scope 1 and 2 emissions by 5%	Reduce Scope 1 and 2 emissions by 11% against 2016 baseline	Long-term target (2050) Reduce Scope 1 and 2 emissions by 56% against 2016 baseline	
	Reduce Scope 3 emissions by 2%	70% of the Group's subcontractors (by spend) will be required to disclose their own emissions	2023 target – reduce Scope 3 emissions by 9%	70% of the Group's subcontractors will have established their own SBTs	
	CO2e emissions generated by the Group's vehicle fleet	Reduce CO2e emissions by 5% against 2016 baseline	Reduce CO2e emissions by 11% against 2016 baseline	Reduce CO2e emissions by 56% against 2016 baseline	
Percentage of total waste generated and diverted from landfill	94% of waste diversion from landfill		98% of waste diverted from landfill	100% of waste diverted from landfill	

Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PR	Rev 1	Jane King	Jan 2	36 of 37

Environmental and Sustainability Management Plan (EMP) – PEP Part 3

PROJECT SPECIFIC	
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Document Reference	Process Parent	Revision Status	Document Owner	Date	Page
SE PLN 01	PM PRO	Rev 1	Jane King	Jan 2020	37 of 37

