

APPENDIX 3.3: OUTLINE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)

Introduction

A Construction Environmental Management Plan (CEMP) would be developed by the Applicant's Principal Contractor (PC) based upon the Schedule of Mitigation included within the EIA Report. The CEMP would be prepared following receipt of s37 consent for the Proposed Development from the Scottish Ministers. The CEMP would comply with The Highland Council (THC) Guidance Note, Construction Environmental Management Process for Large Scale Projects, August 2010. The CEMP would typically be required as a condition of the deemed planning permission (granted by Scottish Ministers under section 57(2) of the Town and Country Planning (Scotland) Act 1997). The CEMP would be submitted to The Highland Council (THC), in consultation with Scottish Environmental Protection Agency (SEPA), Scottish Natural Heritage (SNH) and other relevant THC services.

The CEMP would detail the requirements and expectations of the Applicant and would be used by the PC to manage the environmental and consenting requirements of the Proposed Development. The CEMP would set out the relevant guidance and policy requirements, drawing upon the Schedule of Mitigation from the EIA Report, and include reference to the Applicant's standard construction environmental management standards.

Development and Implementation of the CEMP

As part of the initial design phase the Applicant has prepared a number of plans to identify and manage environmental risk. The development of the plans has allowed towers and access tracks to be microsituated to minimise environmental effects, such as the avoidance of deep peat and watercourse crossing design.

The PC, working with the Applicant's Environmental Management Team, would ensure mitigation detailed in the CEMP is transposed into Work Packs / Method Statements before construction in each area begins. They would identify potential environmental risks and mitigation measures for each key site activity.

The CEMP would be a live document and implementation and updating of it would be a condition of the PC's Contract with the Applicant. The PC would be required to implement the CEMP through all sub-contracts.

Monitoring effective implementation of the CEMP would be a contractual responsibility of the PC. The Applicant would establish audit and oversight procedures to ensure the proper implementation of the CEMP by the PC and the effectiveness of the measures contained within it at mitigating environmental impacts. Where significant amendments are required to the CEMP, the proposed amendments would be issued to relevant stakeholders for review, prior to adoption.

Outline Content of the CEMP

The construction phase CEMP would be developed based on the following information sources:

- pre-construction environmental survey data;
- micrositing information (where relevant);
- environmental commitments made during the consenting process; and
- landowner and other Applicant requirements (where relevant).

Table 1 below provides an indicative structure of the CEMP.

Table 1: Indicative Structure of CEMP

Chapter	Content
Introduction	States the document purpose, and the approach to Environmental Management.
Project Description	Describes project background / proposed works.
Project Environmental Management	Outlining responsibilities of the Applicant and PC, including the role of environmental manager and environmental clerk of works (ECoW), as well as any other technical support that may be required, e.g. hydrologist, ecologist, archaeological clerk of works (ACoW), etc.
Environmental Policies and Procedures	Details environmental policies and procedures of relevance to the project.
Communications and Training Plan	Details how the PC will communicate environmental matters to site personnel (E.g. works packs / method statements, daily briefings, tool box talks, induction, etc.
Environmental Auditing and Monitoring Plan	Details how the PC will monitor the works in accordance with the CEMP.
Emergency Response Plan	Details emergency response procedures.
Pollution Prevention Plan	This will be developed by the PC to comply with the construction license required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended.
Waste Management Plan	Details how waste material arisings will be managed during construction.
Water Management Plan	Details how surface water runoff and drainage will be managed during construction.
Soil Management Plan	Details how soil (not peat) will be stripped, stored and reinstated.
Peat Management Plan	Details how peat will be stripped, stored / stockpiled and reinstated.
Cultural Heritage Management Plan	Details how cultural heritage is to be managed in line with a Written Scheme of Investigation (WSI) provided in the EIA Report.
Ecological Management Plan	Details how ecology will be managed in accordance with mitigation agreed in the EIA.
Construction Noise Management Plan	Details working hours and how construction noise is to be controlled in line with best practise and guidance.
Air Quality Management Plan	Details how air quality will be managed.

The scope of works covered by the CEMPs will be agreed between the PC and the Applicant prior to works commencing and updated as required by the PC.

Environmental protection measures and any necessary hold points identified (for example, requirements for consultation, further protected species surveys or for Technical Specialists to be on-site) will also be integrated into appropriate Method Statements for all key activities, which the PC is required to produce.

In drafting the CEMP, the potential for environmental impacts from unforeseen / unplanned events will also be considered and site-specific emergency protection measures identified. The PC will be required to identify general procedures for such emergencies as part of its site management practices.

The CEMP will be used to ensure all environmental commitments are delivered on site and that the environment is adequately protected. The guidance included in the CEMP will be updated throughout the construction period, if required, and control measures amended or expanded as necessary.