



Tidal Lagoon Swansea Bay

Construction Environmental Management Plan

DCO Requirement 5

May 2020

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Appendix N	Terrestrial Disturbance of Unexploded Ordnance
Appendix AB	Reptile Strategy
Appendix AC*	Flood Response Plan

*Not submitted at this stage as relates to marine works

1 Introduction

1.1 The development

- 1.1.1 Tidal Lagoon Swansea Bay (TLSB) will be the world's first purpose built tidal energy lagoon. The generating station will have an installed capacity of 320 megawatts (MW) and will enclose part of Swansea Bay, from the eastern side of the River Tawe to the eastern edge of the new Swansea University Bay-Campus (SUBC). In total the seawall will comprise an approximately 9.5km-long, U-shaped seawall which will encompass approximately 11.5km² of the seabed, foreshore and intertidal area of Swansea Bay.
- 1.1.2 TLSB made an application to the Planning Inspectorate on 7 February 2014 for a Development Consent Order (DCO) for a tidal lagoon (the Project) in Swansea Bay, South Wales. Examination of the application closed on 10 December 2014 and development consent was granted by the Secretary of State (SoS) on 9 June 2015. The DCO covers both terrestrial and marine construction works. A parallel application was made to Natural Resources Wales (NRW) Marine Licensing Team (MLT) for a Marine Licence. The marine licence is required for construction, dredging and marine disposal works within the sea.
- 1.1.3 The Construction Environmental Management Plan (CEMP) is a requirement of the DCO for the Project and as such has been prepared by TLSB in conjunction with principal contractors for approval by the relevant planning authorities. The CEMP has been developed to address construction issues that are relevant to Work 7a (Work No. 7a — A new internal access road comprising 2 carriageways together with a fence in between running in a north-easterly direction from 267048E; 191928N to 269035E; 192887N.) and associated supporting work. Marine elements are not proposed during the initial construction phases and therefore these are not covered by the initial CEMP.
- 1.1.4 This CEMP has been developed so that it is 'substantially in accordance with the outline Construction Environmental Management Plan' dated 25 November 2014, as set out within DCO Requirement 5 (reproduced in Section 1.2 below).

1.2 The DCO requirements

- 1.2.1 The CEMP has been prepared to address the specific Requirements of DCO Requirement 5. Note only the elements of the Requirement that are shown in **bold type (added below)** are being addressed at this time in relation to Work 7a and associated further development.

5.—(1) No authorised developments are to commence until a CEMP substantially in accordance with the outline Construction Environmental Management Plan, has been submitted to and approved by the relevant planning authorities in consultation with Natural Resources Wales.

(2) All construction work must be carried out in accordance with the CEMP approved under sub-paragraph (1).

(3) No operation of the authorised development is to commence until an OEMP, substantially in accordance with the outline Operational Environmental Management Plan, has been submitted to and approved by the relevant planning authorities.

(4) Operation of the authorised development must be in accordance with the approved OEMP.

*(5) The **CEMP** and OEMP must include, but not be limited to, mechanisms for the provision and implementation of the following mitigation matters—*

(a) lagoon wardens during the operational phase, whose responsibilities include (but are not limited to) securing the delivery of the OEMP and managing public access;

(b) a Reptile Strategy which provides for their habitat retention and management, and where necessary, their translocation to suitable receptor sites;

(c) access for otters, which is to be maintained at all times between the docks, River Tawe and the coastline;

(d) providing that reversing alarms which are not audible beyond the development site boundaries must be fitted on any Heavy Goods Vehicles (HGVs) and mobile plant that are active during the construction phase during hours of darkness, weekends (Saturdays and Sundays) and bank holidays.

2 Objective and scope of the CEMP

2.1 Purpose

- 2.1.1 This CEMP has been prepared to address Requirement 5 of the DCO (see Section 1.2) relevant to Work 7a and associated further development that is proposed. It outlines the responsibilities and environmental standards that will be adopted by TLSB and its contractors during the initial construction phase of the Project to ensure compliance with relevant environmental legislation, best practice and procedures and to ensure project specific mitigation measures are employed.
- 2.1.2 The overall objective of the CEMP is to detail the measures required to manage and where necessary, mitigate the environmental effects associated with construction of the Project.
- 2.1.3 The CEMP will be used by TLSB staff and contractors as a central source of information relating to the environmental management and mitigation measures that will be applied, on site, during the construction phase of the Project. The CEMP will also be made available to relevant regulatory and enforcement organisations to ensure environmental compliance across Project construction activities.

2.2 Objectives

- 2.2.1 The CEMP has two primary functions:
- To ensure environmental consent requirements relevant to the construction phase are fulfilled; and
 - To ensure compliance with legislative requirements and relevant best practice across project construction activities.

2.3 Scope

- 2.3.1 This CEMP has been drafted substantially in accordance with the outline Construction Environmental Management Plan dated 25 November 2014. The scope of the CEMP has been informed by DCO Requirement 5 (see Section 1.2).
- 2.3.2 The scope of the CEMP is to cover the environmental management for the initial construction phase only.
- 2.3.3 The Construction Phasing Scheme (DCO Requirement 3) provides full details on the phasing of DCO Requirement approvals.
- 2.3.4 A separate Operational Environmental Management Plan (OEMP) will be produced in advance of the operational phase as required under DCO Requirement 5.

2.4 Structure

- 2.4.1 The CEMP must be substantially in accordance with the outline CEMP dated 25 November 2014, as required under DCO Requirement 5. The structure of this CEMP has therefore been drafted with the outline CEMP as a basis and built upon where appropriate to ensure that the final CEMP is a clear and concise management plan that can be utilised by the local authorities, regulators, TLSB and construction staff in an effective manner. The CEMP includes the environmental topics set out within the outline CEMP that are relevant to Work 7a and associated further development proposed during initial construction activity.
- 2.4.2 A list of the appendices included within the CEMP for the initial phase of construction is provided below:

Table 2.1 CEMP Environmental topics relevant to initial (terrestrial) phase of construction

CEMP Environmental Topic
Terrestrial ecology
Onshore transport
Air quality
Hydrology and flood risk
Land quality and hydrogeology
Noise and vibration
Cultural heritage: terrestrial archaeology

Table 2.2 CEMP Appendices

Appendix Number	Document Title
G	Materials Management Plan
H	Nuisance Dust Survey
I	Machinery and Dust Method Statement
K	Pollution Prevention Plan
L	Emergency Spill Response Plan
N	Terrestrial Disturbance of Unexploded Ordnance
AB	Reptile Strategy
AC	Flood Response Plan*

***Note that Appendix AC Flood Response Plan is not required in relation to Work 7a and associated construction under Phase 1 and is therefore not provided at this time.**

Table 2.3 CEMP Supporting Information

Document Title	Relevant DCO Requirement
Site Perimeter Plan	DCO Requirement 10
Noise Monitoring and Control Scheme	DCO Requirement 18
Construction and Security Lighting Scheme	DCO Requirement 24
Contamination and Groundwater	DCO Requirement 12
Site Waste Management Plan	DCO Requirement 20
Terrestrial Invasive Species Construction Management Strategy	DCO Requirement 31
Habitat Creation Strategy	DCO Requirement 29
Construction Phase Traffic Management Plan	DCO Requirement 21
Highways Scheme	DCO Requirement 9
Terrestrial Written Scheme of Investigation	DCO Requirement 16,17

2.5 Plan location

2.5.1 A copy of this CEMP will be held at the site offices.

3 Legislation and best practice

3.1 Legislation

- 3.1.1 TLSB, its contractors and all subcontractors will, in undertaking the construction of the Project, ensure compliance with all relevant legislation and that all necessary licenses and permissions are obtained.

3.2 Best practice

- 3.2.1 TLSB will require that all possible best working practices are applied by its contractors and subcontractors throughout the construction of the Project.

4 Site arrangements

4.1 Site security

- 4.1.1 The construction site will be sufficiently secured at all times to protect the public and prevent unauthorised entry to or exit from the Project site through the provision of site perimeter fencing. Full details of security fencing are provided within the Site Perimeter Plan DCO Requirement 10.

4.2 Site hours

- 4.2.1 Throughout the initial construction phase of the Project the normal hours of working will be:

Monday to Friday: 8am-5:30pm

Weekend: 8am – 1:30pm

- 4.2.2 Weekend working will only be undertaken if absolutely necessary and after written consent has been obtained from the TLSB Project Manager.
- 4.2.3 Construction works will be carried out throughout the year, unless otherwise specified within relevant Environmental Strategies and Construction Method Statements.
- 4.2.4 A separate Noise Monitoring Scheme document to address DCO Requirement 18 has been developed. This provides details of the noise monitoring and mitigation proposed; particularly for those works onshore close to sensitive receptors.
- 4.2.5 Should works be necessary outside normal or agreed working hours, the local planning authorities will be informed where required through a Section 60 Notice under the Control of Pollution Act 1974.

4.3 Site management

- 4.3.1 Best practice construction site housekeeping methods will be applied at all times by TLSB staff and contractors. This will include the following:
- Staff will be made aware of energy efficiency and the measures to be implemented to reduce energy consumption;
 - Measures to promote the efficient use of water on site will be adopted where practical;
 - All working areas will be kept in a clean and tidy condition;
 - All site waste and litter will be collected at regular intervals, adequately contained and segregated for recycling where possible;
 - Adequate toilet facilities will be provided for all site staff and regular standard checks will be made;

- All working areas will be designated non-smoking areas. Specific areas within the Project site may be designated as smoking areas and shall be equipped with containers for smoking waste;
- Open fires will be prohibited at all times; and
- All necessary measures shall be taken to minimise the risk of fire and all TLSB staff and contractors shall comply with the requirements of the local fire authority.

4.4 Site clearance

- 4.4.1 All working areas shall be cleaned and cleared upon the completion of works.

4.5 Public information

- 4.5.1 Information relating to the Project during construction will be publicised in the following manner:
- On site notice boards;
 - On the Tidal Lagoon Swansea Bay Project website;
 - In general correspondence to stakeholders.
- 4.5.2 TLSB will announce in advance of the commencement of construction:
- The date construction is due to begin;
 - Information on how to make a complaint relating to construction activities.
- 4.5.3 This announcement will be in the form of a local press advertisement.
- 4.5.4 A request for information or complaint regarding construction activities can be made using the contact details provided below.

Public information points of contact

A request for information or complaint can be made:	
i.	In person at the site offices
ii.	By telephone at [+44 1452 303 892]
iii.	By letter to [7a Works Project Manager, Pillar & Lucy House, Merchants Road, The Docks, Gloucester, Gloucestershire, GL2 5RG]
iv.	By email at [info@tidallagoonpower.com]

4.6 Complaints

- 4.6.1 Complaints made during the construction of the Project by either an individual or organisation will be treated confidentially and dealt with quickly and thoroughly by

TLSB. The complaints procedure has two stages and is set out in detail in Figure 4.1 below.

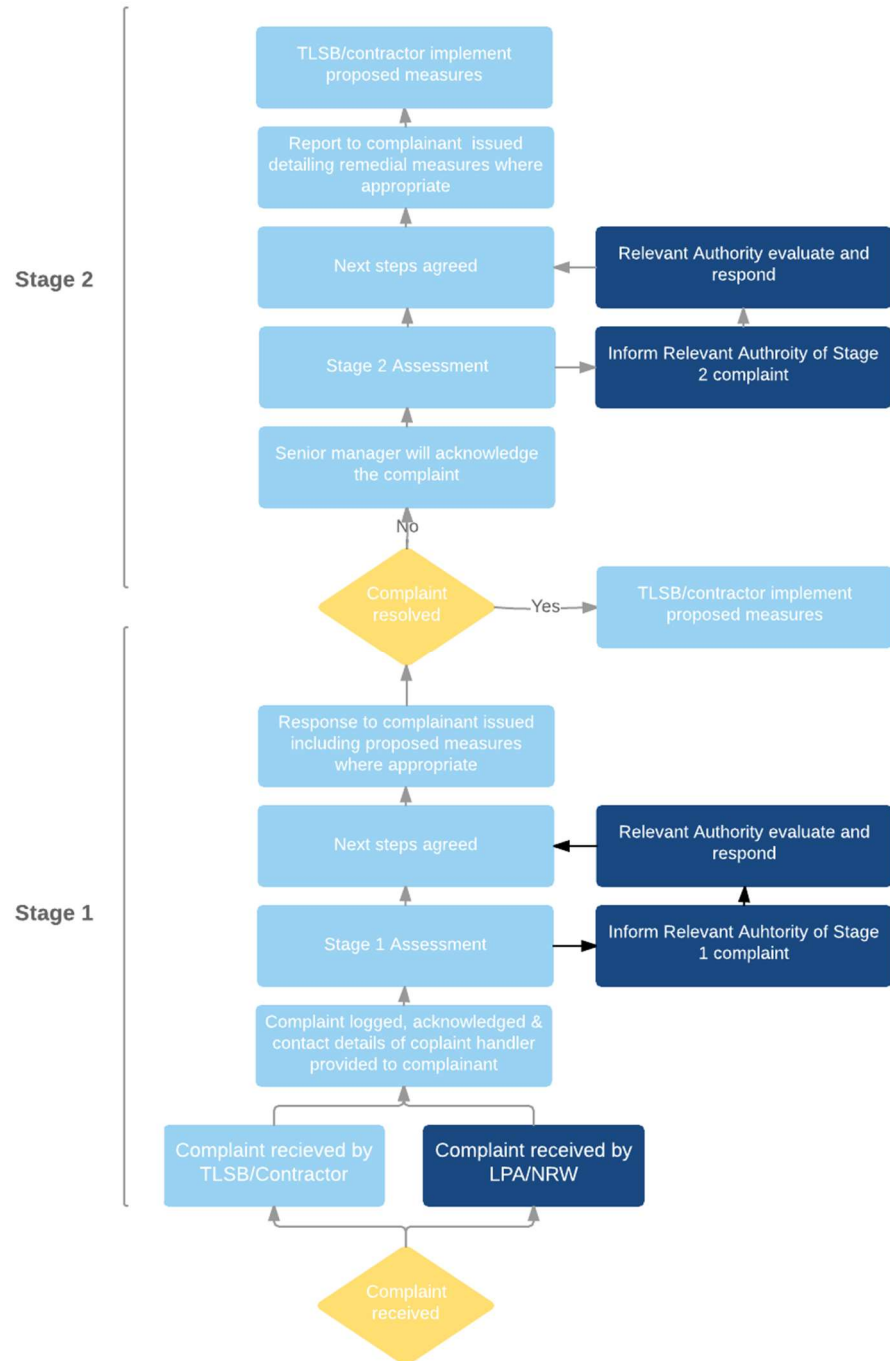


Figure 4.1 Environmental complaints procedure

- 4.6.2 In all cases, where remedial measures are deemed appropriate and are proposed following a complaint, these will be implemented within a suitable timeframe.
- 4.6.3 Should a complaint be received by a contractor or sub-contractor, this shall be passed onto TLSB immediately for investigation and further communication with the complainant as outlined above.

5 Environmental responsibilities

5.1 Environmental Liaison Officer

- 5.1.1 An Environmental Liaison Officer (ELO) will be appointed for the duration of the construction period.
- 5.1.2 The post of the ELO is intended to provide a focus on environmental issues related to works carried out as part of the construction of the Project.
- 5.1.3 In summary, the key responsibilities of the ELO will include:
- Working from the Project site office;
 - Assessing contractors' environmental method statements;
 - Liaising with contractors to provide advice on the provision of suitable environmental induction training for all site personnel;
 - Undertaking inspections and audits of the Project Site;
 - Acting as an interface for environmental issues between TLSB, the project design team, contractors, the local authorities and regulatory bodies;
 - Attending site progress meetings with contractors as necessary, and, where required, meetings with the local authorities, regulators or other stakeholders to provide a focus for any environmental concerns;
 - The ability to recommend changes to construction practices to the Project Manager to help protect the environment or recommend suspension of construction activities while an environmental issue is investigated if necessary;
 - In the event of an environmental incident, assisting the relevant Contractor Site Team in implementing the appropriate management strategy, liaising with the relevant authorities, providing recommendations on remediation and future prevention where necessary;
 - Maintaining records of all site training, environmental incidents and communications with stakeholders; and
 - Preparing Monthly Summary Progress Reports for submission to the relevant TLSB Directors.

5.1 Construction contractor's scope

- 5.1.1 The initial phase of work (Work 7a and associated further development) covered by this CEMP document is shown on the Atkins Extent of 7a Drawing TLSB-ATK-03-XX-SK-D-00006_P01.

5.2 Roles, responsibilities and contact details

- 5.2.1 Table 5.1 below details the key TLSB and contractor roles and responsibilities associated with the construction of the Project. Table 5.2 provides an overview of

the key regulatory bodies. The relevant contact details are also provided for each key role or stakeholder. These tables will be updated as appropriate to ensure information remains up to date.

Table 5.1 TLSB roles, responsibilities and contact details

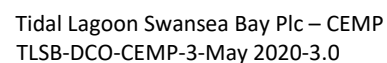
Role	Responsibilities	Contact details
Contractor's Project Manager	Construction delivery	TBC
Contractor's ELO	Environmental compliance during construction	TBC
TLSB Project Manager	Project oversight	TBC
TLSB Environmental Manager	Oversight of environmental issues on behalf of client	TBC

Table 5.2 Stakeholder roles and responsibilities

Organisation	Responsibilities	Contact details
City and County Swansea Council (CCSC)	LPA	TBC before works commencement
Neath Port Talbot County Borough Council (NPTCBC)	LPA	TBC before works commencement
Natural Resources Wales	Regulator	TBC before works commencement
ABP	Land Owner	TBC before works commencement



Figure 5.1 Design drawing - TLSB-ATK-03-XX-SK-D-00006_P01



6 Environmental reporting

6.1 Communications and routine reporting

6.1.1 The Contractors' Environmental Liaison Officer (ELO) will submit Monthly Progress Reports to the TLSB Project Manager. The Monthly Progress Report will include as a minimum the following standard information:

- Reportable incidents;
- Near misses;
- Consents, permits and licences non-conformance; and
- Observations (Safety & Environmental).

6.1.2 The ELO will provide a point of contact for communication and regular reporting to the relevant regulatory authorities regarding environmental issues where required.

6.2 Training

6.2.1 All contractors involved in the project have a responsibility to ensure that this document and other relevant environmental information are disseminated to all personnel, including direct employees or sub-contractors. This will be achieved through a Site Induction and site briefings/tool-box talks.

6.2.2 All staff will receive a Site Induction which as a minimum will provide details on the environmental measures relevant to their scope of works.

6.2.3 Records of Site Inductions and briefings/tool-box talks will be maintained, including a record of the content and date given. Attendees must complete a sign off sheet to indicate they have received and understood the Site Induction or briefing. Subjects to be included in the Site Induction include but are not limited to;

- Waste management;
- Invasive species;
- Pollution prevention;
- Spill response;
- Noise; and
- Dust.

6.3 Environmental incident, management and notification

6.3.1 Environmental incidents are classified into the following three tiers:

- Tier One – Major Environmental Incident;
- Tier Two – Serious Environmental Incident; and
- Tier Three – Minor Environmental Incident.

6.3.2 Definitions of each Environmental Incident Tier are provided in Table 5.1 below.

Environmental Incident Tier definitions

Tier	Definition	Actions
Tier One Major Environmental Incident	A significant breach of the regulatory authorities permitting conditions. An emission likely to cause significant environmental harm. The remediation of the environmental damage is outside of the capability of the site. May require assistance from government agencies and or other external resources. Many widespread or long-term complaints. Short term national or long-term local media interest. Ecosystem damage lasting over a year.	• Incident likely to require management practices in addition to the implementation of the appropriate environmental management plan. Where this is the case management practices must be agreed with TLSB and regulatory authorities where appropriate prior to implementation; • Incident requires immediate notification of TLSB and relevant regulatory authorities by the Contractor. • Following the incident, a 'lessons learnt' report to be completed by the Contractor and TLSB and circulated to the relevant staff.
Tier Two Serious Environmental Incident	A breach of the regulatory authorities permitting conditions. The remediation of the environmental damage is within the capability of the site and parent location. Several complaints from individuals and short-term local media interest. No long-term ecosystem damage.	• Incident may require management practices in addition to the implementation of the appropriate environmental management plan. Where this is the case management practices must be agreed with TLSB and regulatory authorities where appropriate prior to implementation; • Incident requires immediate notification of TLSB by the Contractor; and • Incident to be reported to the relevant regulatory authorities within 24 hours. This will be undertaken by TLSB and not the Contractor. • Following the incident, a 'lessons learnt' report to be completed by the Contractor and TLSB and circulated to the relevant staff.

Tier Three Minor Environmental Incident	A localised environmental release, spillage or discharge that does not typically require outside notification and can be corrected by available personnel and/or materials.	• Incident can be appropriately managed through implementation of appropriate environmental management plan; • Incident does not require TLSB or regulatory authorities to be involved with the implementation of the management plan; and • Incident will be reported by the contractor ELO to TLSB in the Monthly Progress Reports
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6.4 Environmental inspections and audits

- 6.4.1 Environmental inspections and audits will be undertaken by the TLSB Project Manager or TLSB Environmental Manager on a monthly basis.
- 6.4.2 The basis of environmental inspections and audits will be the CEMP (and associated plans), statutory consent requirements and relevant legislation. The contractor and any subcontractors shall fully co-operate with environmental inspections and provide information requested by the TLSB Project Manager within an agreed timeframe. Where appropriate, joint inspections and audits will be completed by TLSB and the contractor.

6.5 Non-conformance, corrective and preventative action

- 6.5.1 Through the environmental inspections and audits, the TLSB Project Manager will identify if any non-conformances have occurred.
- 6.5.2 Non-conformances include, but are not limited to, the following:
- Spillages of oils or chemicals;
 - Incorrect segregation of waste;
 - Generation of excessive dust;
 - Disposal of material or items outside of approved sites;
 - Activities carried out without the relevant consent or permit;
 - Conducting site activities outside of permitted times or periods; and
 - Exceedance of noise thresholds.
- 6.5.3 Non-conformances will be documented by the ELO and reported to the Contractor's Project Manager and TLSB Project Manager in a Non-Conformance Report (NCR).
- 6.5.4 Appropriate personnel will be appointed to investigate the non-conformance and ensure preventative action and further management measures are implemented. Timescales for implementing further management will be determined according to the urgency and severity of the non-conformance.

- 6.5.5 Any changes in documentation and environmental plans that arise following the investigation of non-conformances shall be signed off by the TLSB Project Manager. Changes shall be implemented in a timely manner and distributed accordingly. Toolbox talks will be arranged as appropriate to disseminate the relevant information.

6.6 Liaison with external authorities

- 6.6.1 All correspondence received from external authorities must be copied to the relevant TLSB Project Manager and TLSB Environmental Manager who must review any proposed reply before it is sent.



7 Environmental topics

7.1 Environmental topics

- 7.1.1 Table 7.1 below lists the key environmental topics and associated specific environmental issue which require consideration for the initial construction phase of the Project. The table then provides a reference to the relevant CEMP Appendix or DCO Requirement where full details of the associated construction methods, environmental management and mitigation, where appropriate, are provided.
- 7.1.2 Table 7.1 includes all of the environmental topics and specific issues included within the outline CEMP dated 25 November 2014 that are relevant for the initial onshore phase of construction. Where relevant, additional topics have been added to ensure that all construction environmental issues are adequately dealt with.

Table 7.1 CEMP environmental topics and references to relevant CEMP Appendices

Environmental topic	Environmental Issue	Appendix/ DCO Requirement	Appendix title
Terrestrial ecology	Invasive species	DCO Requirement 31	Terrestrial Invasive Species Construction Management Strategy
	Disturbance, injury or mortality of reptiles	DCO Requirement 5	Reptile Strategy
	Disturbance, injury or mortality of invertebrates	DCO Requirement 29	Habitat Creation Strategy
	Disturbance, injury or mortality of otters	DCO Requirement 10	Site Perimeter Plan
	Disturbance of bats	DCO Requirement 24	Construction and Security Lighting Scheme

Environmental topic	Environmental Issue	Appendix/ DCO Requirement	Appendix title
Onshore transport	Impacts of increased road traffic transport during construction	DCO Requirement 21	Construction Phase Traffic Management Plan
	Safe route for pedestrians and cyclists during construction	DCO Requirement 9	Highways Scheme
		DCO Requirement 21	Construction Phase Traffic Management Plan
Air quality	Construction vehicle emissions	I	Machinery and Dust Method Statement
		H	Dust Nuisance Survey
	Construction dust and vehicle tracks	I	Machinery and Dust Method Statement
		K	Pollution Prevention Plan
Hydrology and flood risk	Release as suspended sediment	K	Pollution Prevention Plan
	Build-up of dust and mud	K	Pollution Prevention Plan
	Construction silt combining with run-off	K	Pollution Prevention Plan
	General pollution	K	Pollution Prevention Plan
		L	Emergency Spill Response Plan
	Unmanaged surface water run-off, ground water seepage and de-watering	K	Pollution Prevention Plan
	Leakage of oils and hydrocarbons	K	Pollution Prevention Plan
		DCO Requirement 20	Site Waste Management Plan
	Concrete entering the drainage system	K	Pollution Prevention Plan
	Disturbance of contaminated land	DCO Requirement 12	Contamination and Remediation Scheme
		H	Pollution Prevention Plan
		G	Materials Management Plan
	Disturbance of existing drainage network	DCO Requirement 11	Disturbance of Existing Exposed Drainage Network Plan
	Disturbance to groundwater	K	Pollution Prevention Plan
	Foul and sewerage waste	DCO Requirement 20	Site Waste Management Plan
	Pathways for contaminated run off to each deeper groundwater	K	Pollution Prevention Plan

Environmental topic	Environmental Issue	Appendix/ DCO Requirement	Appendix title
	Flood response	AC	Flood Response Plan
Land quality	Disposal of soil off-site	G	Materials Management Plan
		DCO Requirement 20	Site Waste Management Plan
	Accidental fuel and chemical spills	L	Emergency Spill Response Plan
	Disturbance of unexploded ordnance	AA	Terrestrial Disturbance of Unexploded Ordnance
Noise and vibration	Site preparation and construction noise	DCO Requirement 18	Noise Monitoring and Control Scheme
Terrestrial archaeology	Damage or disturbance of archaeological sites	DCO Requirement 16 and 17	Terrestrial Written Scheme of Investigation

Appendices

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AB	Reptile Strategy
AC	Flood Response Plan*

***Note that Appendix AC Flood Response Plan is not required in relation to Work 7a and associated construction under Phase 1 and is therefore not provided at this time.**

Tidal Lagoon Swansea Bay Plc

