

	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)		FM-SITE-004
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Plan Status:	☒	Preconstruction Stage	☐	Construction / Operational Stage
Revision No:	G	Revision Details:	G (19/06/2025) – Updates Following JBA Review	

INTRODUCTION:

This Environmental Management Plan has been prepared to address the potential environmental impacts that may arise from the construction of the above project and to ensure that they are actively managed and minimised. The actions set out in this Environmental Management Plan are intended to act as a guide and a tool for anticipating, recording and managing any impacts that arise. This also acts as a reference document to relevant Risk Assessments, Method Statements and other appropriate documentation.

PROJECT DETAILS (Including any specific or important Environmental / Ecological details):

As part of the enabling works to Project Invictus, an area of the primary scrap yard needs to be constructed to form the main construction compound. The primary scrap yard forms part of the permanent works and is being constructed early in the enabling works to provide sufficient space. The scrap yard slab will initially be used to found the main site accommodation, security systems and car parking.

The site is located within TATA Steel's Port Talbot site in South Wales. The Site is set within an established industrial area. It is bounded to the north and east by the existing industrial development of the steelworks. The industrial nature of surrounding buildings and structures form a key part of the character and skyline of Port Talbot and form the backdrop to the Site.

Adjacent to the south of the Site and wider steelworks are the coastal floodplain grassland and the Margam Moors Site of Special Scientific Interest (SSSI). This is outside of the proposed work area.

There is a nearby existing water course referred to as 'the Mother ditch' – see section 2 for water and effluent controls.



Once the area has been vacated by the current occupiers and cleared of all materials, the first task will be to set up site including installation of temporary fencing, traffic management and identification of services. The vegetation will then be cleared and any existing stockpiles removed. The work will then proceed to the Earthworks phase. This will involve bulk excavation using a combination of excavators and tracked dozers. Material will be moved on site using articulated dumpers. A muck away operation will then begin whereby tipper lorries will take material off site for licensed disposal. Once the site levels have been reduced to formation then drainage and service installation will begin. The Earthworks and service installation works are due to take circa 6 months to complete. As the drainage progresses, a separate team will follow behind to prepare the ground in readiness for concrete slab construction.

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The works to form a large permanent concrete external slab area will require multiple concrete pours taking place over multiple days each week – spanning a period of circa. 6 months.

The works will include:

- Site clearance
- Vegetation clearance
- Bulk Earthworks
- Service connection preparation works including excavation, pipe/duct laying and chamber/ draw pit construction
- Formation preparation and sub-base laying.
- Laying blinding and slip membrane
- Temporary formwork and mesh re-enforcement where required.
- Laying and finishing of concrete slabs
- Permanent Perimeter fencing

Drainage Phasing – Overview & Programme

Drainage methods during the various phases of the development are outlined below.

Construction Phase: Prior to Installation of Permanent Gravity Drainage Systems

Incident rainwater will continue to drain directly back to ground, via. the natural permeability of the granular stone surface material.

Groundwater which is encountered through excavations &/or dewatering systems, will be pumped across site and discharged into the Mother Ditch via a settlement system. Refer to *Section 2 – Water & Effluent Control* for further detail.

Construction Phase: Following Installation of Permanent Gravity Drainage Systems

Gravity drainage systems will start to be constructed from week 5 in the programme. Drainage construction works will commence from the upstream end of the system, working downstream – towards the point of discharge.

The permanent pollution control device (bypass separator), penstock valve and pumping chamber will all be installed as later activities in the construction programme. Circa. Week 18 to week 22.

Any water that is collected in the partially completed gravity drainage systems prior to completion of the outfall connection, will be pumped into the Mother Ditch, using similar methods and controls that are described in *Section 2 – Water & Effluent Control*.

Completion of the permanent gravity drainage systems is expected to take place at week 23. From this point on, all surface water will drain to the Mother Ditch using these permanent systems.

Occupation Phase: Car Parking during Project Invictus

Following the completion of concrete slab and drainage works, the P-Fields area is intended to be used as a car park for people working on Project Invictus.

Surface water will drain via a combination of gravity and pumped systems, via a pollution control device – as outlined on the Skanska design drawings.

In the event that the storm water pump fails, a temporary pump will be placed in the pump chamber (downstream of the pollution control device) to over-pump the water into the nearby downstream gravity chamber – allowing the water to outfall to the Mother Ditch via. the permanent gravity system.

Should a storm event occur there is enough capacity in the system and on the surface that the wider site will not flood. Also noting that the elements in P-Fields are not sensitive to flooding.

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ENVIRONMENTAL POLICY:

This Project will operate under the principles of the Andrew Scott Environmental Policy.

ENVIRONMENTAL MANAGEMENT SYSTEM:

Andrew Scott's Environmental Management System is part of the company's Integrated Management System and adheres to the principles of ISO 14001:2015. Andrew Scott accepts and acknowledges its obligations and responsibilities under current environmental legislation, regulations and guidance relevant to the industry sector in which it operates, including any site specific additional client / contract requirements, codes of practice, or planning conditions that may be applicable.

CONTRACT SPECIFIC ENVIRONMENTAL ASPECTS & IMPACTS:

Prior to commencing work on site, site specific Environmental Risk Assessments are carried out to identify significant aspects and impacts and to identify mitigation requirements to reduce the environmental impacts.

The outcome of these risk assessments will be used to inform operative tool-box talks and management surveillances during the works.

All construction works will be conducted in accordance with the Remediation Strategy produced by RSK Geoscience - to protect site operatives and future users.

SUMMARY OF ENVIRONMENTAL CONTROLS REQUIRED:

1. Pollution Prevention:

Fuel / Oil

- Fuel is to be stored at least 50m away from any water courses in bunded tanks (at least 110% capacity) in a designated area
- Fuelling to be carried out in designated areas – drip trays to be used
- Spill kits to be available at various locations on site
- All small plant – i.e generators to have plant nappies
- A site-specific emergency spill response to be developed – all site personnel to be inducted in its use to ensure any spills are acted upon immediately and correctly
- Regular inspections will ensure plant is properly maintained and locked when not in use.
- Fuel levels shall be monitored and recorded regularly (sudden changes may be a sign of leaks).

COSHH Substances

- All COSHH materials will be stored within a suitable locked chest within the site compound
- Hazardous liquids shall be transferred using a funnel and drip tray and sealed and returned to the container immediately after use.
- Concrete, cement and grouts are very alkaline and corrosive and can cause serious pollution to water. Wash waters from concrete and cement works should never be discharged into the water environment as this could have serious impact on the water quality and ecology. Proprietary concrete wash out systems for concrete skips and delivery wagons will be used to contain and treat wash water etc.
- COSHH data will be available for all Hazardous Substances, which will all be appropriately labelled.

Additionally – We will ensure:

- Weekly site inspections will be carried out which will include environmental aspects.
- Environmental Toolbox talks will be given to the workforce when required
- Weekly inspections of water courses to be undertaken

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2. Water & Effluent Control:

Sequence and method of working will be planned to minimise impact on environmentally sensitive areas. The methods of working will be clearly outlined during specific operational method statement inductions.

Control of surface Water

- A site surface water management plan will be developed and may include the use of settlement lagoons, settlement tanks, silt fencing and flood barriers.
- Stockpiles will be sealed off when not being worked off, to prevent any material being carried in any run off.
- Where possible vehicles exiting the site will run on hard standings and gravel roads to avoid carrying mud and debris onto roads.
- Where required, the wheels of vehicles will be cleaned at a wheel wash station before exiting onto the local road network. Designated wheel wash area to be set up away from water courses / drains.
- Tracking or washing out next to drains / surface waters must be avoided.
- Jet-washing / cleaning of materials and plant to be undertaken in designated areas only – away from drains and water courses
- Existing, live drainage systems may need to be protected with drain guards
- Road sweepers to be used to clean hard surfaces to reduce risk of sediment entering water courses.
- After periods of heavy rainfall it may be necessary to pump out large pools of rainwater to prevent flooding of excavations and to avoid plant travelling through standing water. Such water that visibly contains solids, will be passed through a settlement weir tank (Silt Buster or similar) prior to discharge.

Ground water in excavations

- Where ground water is encountered in the excavation then this must be pumped out before further excavation work is carried out using the excavator. This will help to limit and control the sediment being carried in the water.
- Bunds may need to be constructed around excavations to avoid additional water running into the excavations
- Small 'sumps' may be constructed to facilitate the de-watering of the excavations – this will be done by excavating a small area slightly lower than the finished level and inserting a perforated pipe surrounded by clean stone and geotextile so as to further filter the water.
- Water will then be pumped into a settlement lagoon or into settlement weir tanks before being discharged.
- If hydraulic pumps are to be used then the oil must be biodegradable.
- TSUK has produced a site wide Materials Management Plan (MMP) (appendix 1) for the wider Electric Arc Furnace (EAF) development. The P Fields hardstanding is standalone but situated within the EAF development site boundary. The MMP is relevant to the handling and treatment of soil in the P Fields area.
- The MMP discuss how soil will be stockpiled and tested prior to re-use including thresholds for that re-use. Its provisions include materials arising from drilling or piling works. The submitted remediation strategy for P Fields provides for the potential re-use of asbestos contaminated soils on-site as long as they meet concentration thresholds and are placed beneath a capping layer.

Discharge of clean uncontaminated water

- Any non-contaminated groundwater pumped from excavations will be controlled via on site settlement lagoons and tanks to limit the amount of sediment and additional water entering the local system. The water can then be discharged into the 'Mother ditch' which is an existing water course along the East side of the site OR onto existing undisturbed surfaces to dissipate naturally via a geotextile bund to arrest any residual silt.
- The settlement lagoons and tanks will be inspected by our management team on a regular basis, and cleaned periodically to ensure their effectiveness. The residual silt will be excavated and disposed of using licensed waste carriers. Alternatively and if practicable, this material will be dried and incorporated into the permanent works.

Other

- Non-return flow valves to be fitted to any temp water supplies
- All welfare waste pipes to designated foul drains or septic tank to be emptied by licensed waste carrier

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- See Section 1. **Pollution Prevention** on Controls of COSHH materials and Fuel / Oil

3. Waste Management:

A Resource Management Plan / Site Waste Management Plan will be utilised on our construction site to promote resource efficiency and to prevent illegal waste activities.

- All waste will be managed in accordance with the waste hierarchy which aims to reduce waste at source and to reduce the quantity that requires final disposal to landfill.
- This project will be registered on the Smartwaste suite - <https://www.bresmartsite.com/products/smartwaste/>
- Good housekeeping, such as effective material storage will be employed to minimise waste.
- All waste streams will be identified, and waste will be segregated and deposited in separate skips as necessary to facilitate efficient waste removal and ease of recycling, for example timber, metal, plastic.
- Dialogue will be maintained with suppliers and subcontractors to minimise surplus material being stored on site.
- Materials will be ordered on a “just-in-time” basis to keep site clear and to prevent unnecessary damage, theft & wastage of materials.
- Duty of care and legal requirements will be complied with at all times.
- Where possible, waste reduction targets will be set, and site personnel informed.
- During Bulk Earthwork and excavation, all material movements will be recorded.
- Excavated material will be tested and classified and where possible it will be re-used.
- Avoid landfill wherever possible – use carriers that promote high recycling rates.
- All office generated waste will be segregated as per the new Wales segregation regulations.
- Waste shall be collected by a licensed waste carrier. A copy of all Waste ‘Duty of Care’ documentation shall be held on site.
- All waste incidents shall be reported immediately to the Site Manager and environmental advisor.
- Where possible, covered skips will be used.

4. Operational Appearance:

Standard Andrew Scott site cabins will be used to maintain a consistent & professional corporate image. Site signage will be erected in accordance with Andrew Scott requirements. Site offices and compound will be kept clear of waste and unnecessary clutter to reduce negative environmental impacts, maintain professional appearance and to reduce prospect of injuries due to slips, trips and falls. Site layout will be in accordance with agreed site plan and will have clearly marked areas for parking, materials storage and vehicle transport routes

- Good provision of Andrew Scott corporate signage
- Provision of corporate PPE for sub-contract labour – helmets and hi-viz vests are ASL branded.
- No agency operatives are permitted to use PPE with non-ASL branded logos etc.
- Ensure clean and tidy site, with unrestricted site access – designated pedestrian access, with signage to direct pedestrians and visitors.

5. Nuisance:

Noise

The normal hours of construction working during the construction period will be:

- 07:00 hours to 19:00 hours Mondays to Fridays;
- 07:00 hours to 13:00 hours on Saturdays.
- No works on Sundays or Bank Holidays.



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The site works include the forming of a large permanent concrete external slab area. This will require multiple concrete pours taking place over multiple days each week – spanning a period of circa. 6 months.

Wherever possible, each concrete pour-day will be sized and planned to ensure that the works are completed and that operatives have left site by 19:00. However, for reasons due to weather and concrete supply (inc. traffic conditions), it is not uncommon for a concrete pour to over-run. In these instances, we will need to continue with the concreting works beyond our typical site working hours. In order to minimise any nuisance and disturbance, we will implement the following controls in accordance with the requirements of British Standard BS5228-1:2009

- If practical to do so – introducing an emergency stop-joint (shutter) to reduce the size of the remaining pour.
- Retain the minimum number of site operatives that are required to safely complete the concrete specific task. Other non-essential tasks to cease.
- Ensure that adequate Site Supervision (management) remains on-site to oversee the works and ensure that operatives are reminded of the need to be respectful of neighbours & surrounding receptors.
- Switch off all non-essential plant and engines.
- Notify the local Authority (Environmental Health) as soon it's apparent that the works are going to over-run.

Other noise & nuisance controls for works during normal working hours, will include:

- Where possible, plant shall be selected with noise levels in mind and it is important that quiet plant or silent plant is used. If possible, electrically powered plant should be used
- Use of acoustic screens or covers where required.
- If operations involving high noise levels must take place, consideration should be given to the people in the immediate vicinity and such works should be limited to the times which will have least impact on the neighbourhood.
- Minimise the drop height of materials – for instance when loading dumpers then the bucket is only to be raised enough to clear the skip and discharge the materials.
- Unnecessary revving of engines to be avoided and switch off equipment when not required
- Ensure continuously running plant is fitted with exhaust silencers

Dust and Debris

- Site measures to mitigate debris onto local roads will be the use of jet wash - wheel wash stations where required.
- In the event that any debris is transferred onto any immediate surrounding roads, a road sweeper will be utilised as soon as possible to remove the mud / spillage / contamination.
- During dry periods a towable suppression bowser will be used to damp down haul routes and keep airborne dust down, a 5mph speed limit will also be enforced.
- Stockpiles will also be 'sealed' to prevent dust rising to the air
- Water hoses will be used during excavation to minimise airborne dust, particularly if the need arises to break out concrete.
- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
- 24 Hour site environmental contact number to be made available and clearly communicated to all interested stakeholders in case of complaint.
- Where possible vehicles exiting the site will run on hard standings and gravel roads to avoid carrying mud and debris onto roads

Lighting

- Switch off all non-essential site lighting. Limiting the lighting to walkways & task-specific.
- Positioning of all lighting so as to avoid direct glare into neighbouring properties / roads.
- All construction site lighting will utilise modern & efficient LED type fittings.
- Wherever possible, time-clocks & motion sensors will be fitted to ensure lights are not left on, during out of hour periods. In instances where this can't be achieved, the Site Manager will ensure that all lights are switched off at the end of the shift.
- The main types and extent of construction site lighting that are currently envisaged, are as follows:

Area Required	Type of Lighting
➤ Site Accommodation – Buildings (internal)	➤ Hard wired LED fittings within the cabins. Switch / sensor controlled.
➤ Site Car Parking & Compound Areas	➤ Either:

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	○ Floodlighting fixed to temporary buildings (welfare cabin / store) ○ Portable floodlighting set(s). ➤ Transferred to 110v hard-wired as soon as electrical supply is available.	
➤ Main vehicular site access & egress gate	➤ Floodlighting – initially using portable gen-set. Transferred to 110v hard-wired as soon as electrical supply is available.	
➤ Main Pedestrian access routes	➤ Combination of floodlighting and festoon walkway lighting.	

Construction lighting can have a negative impact on existing local ecology and biodiversity. Controls that will be implemented to minimise this impact may include:

- Timer controls
- Shielded light fittings
- Reduction of lighting during non-working hours, to essential (safety) lighting only.
- Where possible, the location of lighting will coordinate with sensitive ecological habitats – to be discussed with RSK (site ecological clerk of works)

6. Transport and Traffic Management

- Delivery times will be between agreed site working hours noted in Section 5 above and all delivery vehicles and visitors will be provided with detailed directions to site.
- All deliveries and vehicle movements to follow routes set out in traffic management plan.
- ASL operatives to utilise shared vans for transport to work and minimise parking requirements
- ASL will encourage vehicle sharing by offering staff members 'green mileage rebates', and by using public transport
- Mileage / distance travelled will be monitored by the site management team.
- HGVs will be required to route via the M4 Junction 38, and therefore avoid Port Talbot
- Designated vehicle access point onto site, with lockable gate
- Gateman present during working hours, to assist with vehicle movements on/off site
- Allocation of sufficient turning area / one-way route's through the site area – to minimise the need for vehicle reversing
- Demarcation of segregated pedestrian and vehicular routes
- Use existing hard-standing in ASL Tata compound (near Lagoon) for operative parking – with shuttle mini-bus to be provided by ASL to take operatives between car-park & site.
- Visitor parking to be allocated on-site – utilising clean & compacted stone surfaces.
- Regular machine (excavator) scraping and jet-wash facilities to minimise mud being deposited onto surrounding paved road surfaces.
- Telehandler to be on-site to assist with material offloading. To be accompanied with trained vehicle marshall(s).
- Dedicated loading and un-loading areas to be set up and demarcated
- Site parking to be clearly identified to all site workers and visitors.
- Site location map to be provided to all suppliers, subcontractors and site visitors and communication lines to be kept open between the site and all interested stakeholders at all times.
- Andrew Scott understands the benefit of and will maintain good relations with all interested stakeholders.

7. Habitat Sensitivity:

Approximately 8,920m² of vegetation to be cleared from site as per the marked up areas below.



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With reference to the latest Ecological survey report by RSK (July 2024), the following existing ecological features are considered as important, and will require specific controls:

- Open Mosaic Habitat: Works will be delivered in accordance with the Landscape Mitigation Plan. It is expected that this will include the protection and maintenance of the existing seed bank, by means of storing selected stock-piled material for re-use within the landscaping of the site.
- Protected Species – Reptiles: Close coordination with the project's ecologist. Ensuring that ground is not disturbed during reptile hibernation period.
- Site Clearance will take place in accordance with the recommendations of the ecology survey and the project's ecologist.
 - Vegetation will be removed prior to 01st March in acknowledgement of the bird nesting season
 - Excavation and earthworks will not commence in vegetation areas until reptile hibernation season is complete (circa. February/March)
- Personnel are also to be vigilant with regard to the nesting of birds, bats and mammals and briefed on how to identify their presence.
- Ecologist to be consulted prior to all clearance works
- Any land degraded by construction and not required for the operation of the Proposed Development, such as temporary crane pads and borrow pits, would be restored as soon as possible after construction is completed.
- Any notable floral species encountered would be marked with an exclusion zone or translocated to other suitable areas of habitat or stored for reuse in reinstatement of temporary infrastructure. The implementation of these measures would reduce the potential for impacts on sensitive habitats.
- An Ecologist would be present during enabling works and throughout the construction period of the Proposed Development when required. They will be a suitably experienced individual, whose role would be to provide advice so that the works are carried out in accordance with environmental measures detailed in the CEMP.
- The Ecologist would give regular toolbox talks to make site personnel aware of the ecological sensitivities on-site. The Ecologist would have the authority to stop any construction activity that is having or likely to have an unplanned adverse environmental effect, or be in breach of legislation.
- There are no known knotweed areas within the excavations but staff will be vigilant of its presence when working on embankments and in excavations.

8. Resource Efficiency:

Andrew Scott encourages a "Switch off when not in use" culture and this is included as part of the Andrew Scott site induction which is given to all site personnel. Andrew Scott has commenced monitoring its energy usage in order to identify usage trends and to set targets for reducing energy consumption.

- Sourcing FSC accredited timber
- Regular reconciliation of materials to take place to prevent over ordering and waste.
- Materials will be ordered on a "just-in-time" basis to keep site clear and to prevent unnecessary damage, theft & wastage of materials.

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9. Materials Use:

Where possible materials used should be purchased from sustainable sources and should be reusable / recyclable at the end of the project's life. Andrew Scott will, where possible, carry out value engineering exercises to establish whether it will be possible to substitute materials that will have a less detrimental environmental effect without compromising the specification of the building.

- If any of the excavated material is to be re-used on site it will be tested and classified.

10. Site Management and Security:

A dedicated site team will be allocated to the project to ensure that all aspects of Health and Safety, Environmental management, Logistics and Quality Management are suitably managed. The team will include (but not limited to)

- Contracts Director (Visiting)
- Contracts Manager (Visiting)
- Health, Safety and Environmental Officer (Visiting)
- Planner (Visiting)
- Project Manager (Full time)
- Quantity Surveyor (Full time)
- General Foreman (Full Time)
- Site Supervisors for Earthworks / drainage / Concrete works (Full time)
- The on-site management and operatives will be adequately experienced and trained in their roles and will be made aware of their responsibilities – which will include the establishment and management of Environmental controls contained within this Management Plan.
- Site Management contact details to be made available to all – including out of hours emergency contact.
- ASL procedures will be followed for site inspections– these will include, but not limited to
 - Daily plant and tool inspections
 - Daily excavation / stockpile inspections
 - Weekly Health, Safety and Environmental reports
 - Safety observation system
 - Health, Safety and Environmental inspections by the visiting SHEQ officer
- ASL policies and procedures will be followed for reporting, investigating and closing out incidents.
- At it's peak we anticipate there will be 30 – 40 operatives on site – the welfare for which will be at the existing Lagoon compound.
- The site will be secured by means of Heras fencing complete with lockable gates at all entrance / exit points.
- A dedicated gate man / banksman will be positioned to manage incoming / outgoing traffic
- A register will be kept on site which all persons entering / leaving site will need to sign

11. Construction Plant & Technologies

The majority of the works will involve the use of large (heavy) site plant. This will vary depending on the exact task. Typically, the main & regular items of plant will include:

- Tracked excavators (13t – 50t)
- Dumpers (9t+)
- Earthwork compaction rollers (single drum 3.5T – 13T)
- Telehandler
- Mobile concrete pump
- Air compressor
- Site cabins – with generator supply
- Small tools – concrete finishing pans & floats, concrete saws, drills etc.

Aside from the small tools, the majority of the plant will be powered by diesel engines. Environmental controls will include:

- Modern & efficient fleet of plant
- Use of HVO fuel wherever possible
- Regular, recorded maintenance
- Daily operator checks

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- Spill kits and training
- Switch off idle plant

12. Construction Methods & Materials

Bulk Earthworks:

- Vegetation strip using mechanical methods (inc. brush cutters & chainsaws), in consultation with the project's ecologist.
- Reduced level dig (bulk excavation), using large tracked excavators and dumpers. The works will be planned to minimise the period of time where the earthwork formation is left exposed. The Aim will be to cover-up exposed earthwork surfaces within 24hrs helping to control the risk of surface water run-off and tracking of mud.
- Initial storage of surplus earthworks material in stock-piles close to the site area – minimising travel distance wherever possible.
 - Sealing of stock-piles to help control run-off and dust nuisance
- Any surplus earthworks material that cannot be re-used in the works, or within the wider Port Talbot works will be disposed off-site using licensed HGV transport (typically – 8 wheel tippers).
 - Loads to be covered when being transported
 - Rate of lorries will be planned & monitored by the site manager to ensure that congestion is minimised on the Tata site, and surrounding road network.

Drainage & Below Ground Services:

- Wherever possible, drainage excavation and installation works will be carried out from a clean-stoned working platform. Helping to minimise tracking of mud across site.
- Trenches to be excavated and backfilled using tracked excavators.
- Wherever possible, excavated material will be used as backfill – minimising the need for imported material, and disposal.
- All excavations and stockpiling will be subject to Temporary works checks, and designs where applicable.

Concrete Slabs:

- Following completion of the bulk earthworks and drainage works, the slab areas will be prepared for concreting. Preparation works will include final surface levelling using excavators and compaction rollers, followed by timber edge shuttering and laying of steel mesh reinforcement.
- As slab areas are made ready, the slabs will be poured using off-site pre-mixed concrete which will be delivered to site in enclosed HGV's (typically 6 - 8 wheel lorries).
 - Where direct discharge is not practical, concrete will be placed using a mobile concrete pump & boom
 - Concrete pour days will be planned and sized to ensure the number of lorries attending site will be kept manageable, within constraints of the site and the local roads.
 - Each concrete pour will be finished by mechanical powered pans & floats. Refer to the *Nuisance* section of this CEMP for further environmental considerations regarding this activity.

13. UXO

With reference to the RSK Desk Study Report dated September 2024 (ref. Appendix C), RSK conclude that the site is deemed to exhibit a Moderate risk with regards to encounter of items of German UXO, with a zone of Moderate risk relating to encountering items of Allied UXO.

RSK further conclude that there is an overall Severe risk of harm with regards to UXO.

In order to manage and control the risk of UXO's, we will engage with the Project's UXO consultant to agree a set of specific controls for the P-Fields works. It is expected that these controls will include some of the recommendations within the RSK report. Potential controls:

1. UXO Safety Awareness Briefings: These will be provided to all personnel on-site in order to ensure all persons can demonstrate a basic level of knowledge of UXOs and an understanding of what to do, in the event that a UXO is suspected. Briefings to be provided by a UXO specialist.

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2. Magnetometer Survey: Intrusive & non-intrusive methods will be considered. Noting however, that the proposed P-Field works do not include any piling installations. Furthermore, the presence of blast furnace slag (potential magnetic interference) may yield magnetometer survey's as being unsuitable for the P-Field works. This will be discussed with the Project's UXO consultant prior to works commencing.
3. UXO watching Brief: Attendance by a UXO engineer to oversee elements of the excavation works, utilising specialist tools (i.e. hand held magnetometer). Extent of attendance to be discussed and agreed with the Project's UXO consultant.
4. On-Hand Support: Project UXO consultant to be appointed to provide ongoing support to the project team as the works progress. This will include the update and provision of ongoing site briefings. It will also include the services of a UXO specialist to act as a liaison between the site team, and the emergency services (inc. bomb disposal & UXO investigation team) in the event that a UXO is discovered or suspected.

The Project's UXO consultant may also be appointed to carry out further review & consideration of the UXO risk, taking into account the specific works and methods that are proposed for the P-Fields site. This could potentially reduce the current risk rating, for this portion of the works. All controls for site activities will be discussed and agreed with the UXO specialist consultant.

14. Complaints Procedure

We will respond to enquiries / investigate complaints in a timely manner. Enquiries and complaints can be received from the following sources:

- SRM Communications
- TATA Complaints Procedure
- Neath Port Talbot Council Monitoring

The Project Manager will be the first point of contact and will work closely with the relevant project team members to ensure appropriate action is carried out in response.

Regular contact will be established with the interested party with updates provided to reassure that their concerns are being taken seriously and addressed.

In circumstances where site cannot respond, the matter will be referred to Senior Management for further investigation, with all relevant internal parties kept fully informed of progress.

All contact, whether general enquiry, complaint, or compliment, will be logged on a register which includes the following information:

- Complaint / Enquiry / Compliment
- Date and Time
- Who took the Complaint / Enquiry / Compliment
- Nature of the Complaint / Enquiry / Compliment
- Root Cause
- Remedial action
- Close out date
- Follow up actions (including raising of NCRs for non-compliance)

Toolbox Talks: The following environmental toolbox talks are to be inducted to the workforce as a minimum. Copies of toolbox talks are available in Appendix C of this document

1	Spill control	8	Working with Plant
2	Washing down Plant and machinery	9	Waste Management – Reduce / Re-use / Recycle
3	Control of road sweeper arisings	10	Storage of Waste

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4	Nesting birds	11	Water Pollution – Cement & Concrete
5	Japanese Knotweed	12	Asbestos Awareness
6	Dust & air quality	13	Noise & Vibration
7	Energy & fuel efficiency	14	Segregation of waste

PROJECT SPECIFIC ENVIRONMENTAL TARGETS:

1	Zero environmental complaints (dust, noise, etc)		
2	No Environmental Incidents		
3	All Waste taken to Waste Management Facility		
4	All Waste Monitored via SWMP		
5	Recycle/Reuse materials where possible		
6	Minimum of one annual spill control emergency drill conducted		

KEY REFERENCE DOCUMENTS (Andrew Scott IMS unless stated): [Section 4.1 of IMS](#)

FM-SITE-002 - ENVIRONMENTAL RISK ASSESSMENTS	PR-ENV-01 - ASL Environmental Code of Practice
FM-SITE-014 - EMERGENCY SPILL RESPONSE PLAN	PR-ENV-02 - Procedure for Groundwater controls
FM-SITE-020 - SITE WASTE MANAGEMENT PLAN TEMPLATE	PR-ENV-03 - Pollution Incident Control
	PR-ENV-04 - Waste Management Procedure
	PR-ENV-05 - Dust Control & Air Control Procedure
	PR-ENV-06 - Noise & Vibration Control Procedure
Other:	Other:
Other:	Other:
Other:	Other:
Other:	Other:

MISCELLANEOUS NOTES:

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This Environmental Management Plan Completed by:			Dafydd Jones
Date:	20/01/25	Designation:	Senior Site Manager
Distribution:			

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This Environmental Management Plan is to be made available to any persons writing method statements to ensure that all Environmental Controls are taken into consideration.



1. Introduction

This document is design to meet the requirements of Condition 14 and 15 of planning permission 2024/0711, which relates to the construction of a new electric arc furnace at the Port Talbot Steelworks.

These conditions are included below for ease of reference:

Condition 14:

“Prior to the commencement of a phase of development as approved by Condition 4, a Material Management Plan (MMP) shall be submitted to and approved in writing by the Local Planning Authority (LPA). The MMP (for that phase) shall outline the procedures and methodologies for the management, reuse, storage, transportation, and disposal of materials (including soils, slag and other excavated material) arising from the development or imported onto site or exported from the site. The development shall be carried in full accordance with the approved MMP, and all materials shall be managed as detailed within the plan for that construction phase.”

Condition 15:

“Prior to the commencement of a phase of development as approved by Condition 4, (with the exception of site clearance and demolition works) a Soils and Peat Management Plan (SPMP) shall be submitted to and approved in writing by the Local Planning Authority (LPA). The development shall be carried out in full accordance with the approved SPMP for that reason.”

The document is designed to be a high level and site wide strategy that establishes the principles of how material is managed in delivering the EAF development. It applies to all phases of development. Its structure and content have been discussed informally with officers at Neath Port Talbot Council (NPT) prior to the submission of the application.

The document should be read in conjunction with the Phase 2 Site Investigation Report (March 2025) and Remediation Strategy (April 2025) prepared by RSK Geo-Sciences in relation to conditions 6, 7 and 8 imposed on the EAF planning permission at the site.

1.1. Summary of Proposed Development

The hybrid planning permission provides for the following development:

‘Hybrid planning application: full planning permission for the demolition of existing buildings and structures, partial infill of the BOS lagoon, and construction of a new electric arc furnace-based steel production facility (1 no. arc furnace, 2 no. ladle furnaces). The development includes an upgraded slag processing facility, chemical/material storage and transfer infrastructure and pipework and cabling (above and below ground), buildings, fume and dust treatment plant, water treatment facility and material handling systems. Electrical control rooms and power infrastructure. Offices and ancillary facilities together with new and amended transport infrastructure, landscaping and green infrastructure, and associated engineering operations.

Outline planning permission (with all matters reserved except for access and landscaping) for demolition and the construction of a scrap metal handling facility and associated scrap yards, scrap processing facility, underground and overground electrical infrastructure, and new and amended transport infrastructure, landscape and green infrastructure, drainage and associated engineering operations.

1.2. Document Purpose

This document lays out the principles in which soils, excavated materials and suitable stockpiled materials are to be handled associated with the EAF Meltshop project at Port Talbot Steelworks. There is a requirement for a significant cut and fill exercise across the construction site to facilitate various aspects of the development. This will likely generate a significant amount of soil, much of which will be anthropogenic in nature. The site was originally reclaimed from the mud flats and dunes that formed the port area prior to its development from the early 1920's to the present day. Much of the made ground is slag from the various furnaces present over the years, with rubble and construction debris from the various iterations of the works. The majority of this material is entirely suitable to form the basis for the new construction, both chemically and geo-technically.

Tata Steel UK commissioned a Ground Investigation Report and a Geotechnical Design Report to assess the ground conditions and confirm the suitability of re-use. A significant amount of boreholes and trial pits were undertaken during the intrusive section of the investigation. Whilst it is not possible to completely cover all areas of the site, sufficient data has been analysed to characterise the site. Contaminants have been found that would be expected from a century of steel making at the Port Talbot site, including heavy metals, hydrocarbons, and asbestos containing materials. However these contaminants are not widespread through the construction boundary. Most of the impact is associated with the former Grange Coke Ovens and that area is due to be left predominantly undisturbed for the EAF project.

The conclusion of the Geo-environmental report is that some areas of contamination exceed the human health criteria for future occupiers. The recommended remediation is a clean capping layer or concrete slab is installed above these failing soils then it severs the pathway that would cause an unacceptable risk. This remediation strategy should be taken into account when reading this document: soils that exceed the thresholds will be maintained under a clean capping layer to ensure compliance. As noted above, a remediation strategy is being submitted to discharge Condition 6 of the planning permission.

2. General Soil Strategy

In alignment with the waste hierarchy, TSUK will attempt to maximise the re-use of soil on-site. There are areas of the site where levels will need to be significantly reduced. The majority of the rest of the site will be raised to plateau for development and limit the flood risk in the future. In order to maximise the re-use of soil on site, there needs to be a comprehensive soil testing regime in order to ensure that it is suitable for the end-use. Soil will be segregated upon excavation and tested, the exact frequency will be set out in the remediation strategy. The testing suite and proposed thresholds are in Appendix A and are based on the commercial/industrial end-use criteria, and the source of the threshold is included for reference.

The soil will be temporarily stockpiled so the laboratory testing can be completed. It should be noted that the potential for fugitive dust will be addressed as per the Construction Environmental Management Plan and the Air Quality Management Plan. The position of all soil samples will be recorded in order to accurately allow the immediate re-use of the soil once the testing has confirmed compliance. Soil that fails the re-use criteria will be temporarily quarantined in order to assess whether additional testing can allow the soil to be used. For example, a failing stockpile could be further subdivided into 5 sections and re-tested in order

to see if there was an isolated non-conformance or whether the whole stockpile is contaminated above acceptable re-use criteria.

If after re-testing soil is still above the soil re-use criteria then it will be sent for disposal. The testing will be used to complete a basic waste characterisation as per the Guidance on the Classification and Assessment of Waste (WM3). The route of disposal will depend on this classification and whether it passes Waste Acceptance Criteria (WAC) or requires an alternative disposal route, such as incineration.

3. Re-use of Soil and Other Materials on Site

As previously stated, Tata Steel UK has a long history of maximising re-use of its by-products and process materials on-site to provide a stable platform for its operations, stockyards and ancillary areas. TSUK intend to continue this re-use of material, as long as they are deemed to be suitable. The general soil strategy is listed in the previous chapter. Importantly, this approach relies on TSUK demonstrating that material we excavate isn't a waste.

The definition of waste is any material that a holder intends to discard or is required to discard. There has been much discussion on the use of soil in construction or remediation projects and the charity, Contaminated Land: Applications in Real Environments (CL:AIRE) produced a guidance document known as the Definition of Waste: Code of Practice (DoW:CoP). That set out a framework of how soils can be re-used and not classified as a waste. As it states "it is the responsibility of the holder of a material to form their own view on whether that material is waste or not." and then procedures to set out multiple scenarios for re-use on the site of origin or use on other sites or even as part of a hub and cluster arrangement whether there is an intermediate site. In order to formalise the re-use of potentially waste soils, a Material Management Plan (MMP) is produced that details volumes, origins, destination and purpose of soils

For the EAF Meltshop project, TSUK has assessed the risk of soil re-use on site. The risk has been found to be low, which has informed the intention not to discard any soil. For that reason, any soil that is excavated and directly re-used on-site without any treatment is not a waste and therefore will not require an MMP to formalise this.

TSUK and its contractors will continue to test soils and other materials for their suitability for use in various aspects of the project, however, in a situation where soil is excavated and requires remedial treatment in order to be compliant with re-use criteria, then a formal MMP will be created and lodged with CL:AIRE to ensure compliance.

4. Aggregate from Steel Waste: Quality Protocol

One of the major routes to utilising both deposited and stockpile materials is the Aggregate from Steel Waste: Quality Protocol. Basic Oxygen Steelmaking slag (BOS slag) was a major waste produced by the steelmaking process. Its long been valued as a useful, hard wearing aggregate that can be used in multiple construction scenarios, in both bound and unbound applications.

The issue with newly arising slag is that when it reacts with water and atmospheric carbon dioxide it has the potential to expand, which could lead to heave or subsidence issues. The Quality Protocol was created in collaboration with the Environment Agency to counteract this issue and to recognise the value of this material in construction. This allows the use of BOS

slag in a number of construction applications as a non-waste, as long as steps have been undertaken to ensure that the material is suitable for use. The exact testing varies depending on the use but is predominantly related to the geotechnical properties particularly its expansivity.

It should be noted that an entire suite of testing is not required by the quality protocol before the slag can be utilised for construction. A significant programme of testing was done as part of the preparation of the quality protocol document. It showed that, as long as the document is adhered to, BOS slag has no significant environmental impact over the use of other virgin aggregate alternatives. The full text of the quality protocol can be found here: [Aggregate from waste steel slag: quality protocol - GOV.UK](#).

5. Temporary storage

Soil shall be stockpiled close to the origin of the material in designated areas that will be tracked by the principal contractor. The stockpiles will be designated a unique identifier that allows the tracking of the movement of material, but also the testing of the soil. This will be an manual system (with digital storage of all information) and the unique identifier will be assigned to the soils samples when they go to the laboratory. The tracking will include the date of excavation, location, tonnage or volume, confirmation of whether samples have been taken (or re-testing if required), results of analysis and confirmation of whether it is suitable for re-use. The tracking system will also record where the soil is to be re-used on site. This will also be used as evidence for Condition 24 on the use of slag on site, and will be made available to the council upon request.

There is no requirement to store stockpiled material on an impermeable surface unless it shows significant visual or olfactory evidence of contamination. In the case of suspected gross contamination, soil must be placed on an impermeable liner or sealed concrete area with no links to surface water drains.

In all cases, whether contamination is suspected or not, soil must be stored in a way where rainwater cannot run-off into surface water drains or ditches on site. This is in order to prevent silt build up in the drainage network and potential contaminants that could cause a breach of the site environmental permit.

6. Transportation

Soil will be transported to storage areas and areas of re-use on site via the on-site private road network. There will be a variety of both road worthy and non-worthy vehicles moving the soil. This will include Moxy-style tippers and other heavy plant along-side more traditional rigid and articulated tippers. The Port Talbot site has a significant amount of heavy plant for already for its standard operations and its road network is designed to support this.

The Construction Environmental Management Plan (CEMP) covers on-site vehicle movements and potential mitigations for elements such as dust, noise, tracking of soils on to the highway and storage of fuels. All movement of soil will adhere to the standards set out in the CEMP.

If any soil needs to be taken off-site for any reason then it will be transported on road worthy vehicles with the correct carriers license. If this includes off-site disposal of the soil then the load will be accompanied with a Waste Transfer Note (non-hazardous) or a Waste Consignment Note (hazardous waste). The following section details soil as a waste and under what circumstances it could be considered as such.

7. Asbestos

Due to the presence of boilers, furnaces, steam pipelines and other high temperature equipment on-site, there is the potential to find asbestos containing materials (ACM) in the near surface soils. This is predominantly white asbestos (chrysotile) that is usually cement bound but there is also the potential to encounter brown asbestos (amosite) primary from pipe lagging.

TSUK is required to produce a remediation strategy for the works as part of the EAF development. This document will provide greater detail on asbestos and proposals to control it and the risk it poses.

The risk associated with ACM is the potential inhalation of fibres by future users of the site or the construction workers. If the pathway to inhalation can be severed then the risk is mitigated. The standard remediation techniques when encountering asbestos are either removal or encapsulation. The installation of a clean capping layer above the asbestos containing soils is the preferred methodology on this site to protect future users from the risk of inhalation. For this reason, if soil is assessed to be between 0.001 and 0.1% by weight asbestos then it can be re-used on-site as long as clean cover (e.g. material that has passed the specification in Appendix A) is placed above it. This is the same mitigation set out in the Phase II contaminated land report for the presence of asbestos fibres in the made-ground.

Where soil has been assessed to be above the 0.1% hazardous waste threshold or visible ACM containing material is present, it must be disposed of to landfill, unless other mitigation measures are implemented such as solidification. It should be noted that any additional methods of dealing with asbestos have not been discussed with either the Local Planning Authority or the Environmental Regulator and would need to be licensed under the Environmental Permitting Regulations.

TSUK has an active hazardous landfill to the south of the main works that is able to accept asbestos containing material if there is no other route to re-use or remediation.

8. Conclusion

TSUK and its contractors are committed to re-using soil and aggregates generated from the construction activities on-site. A tracking and sampling system will be enforced to understand where soils have originated and where they will be re-used on site and ensure their suitability for incorporation into the earthworks design.

TSUK is fully aware of its obligations under waste law and have multiple mechanisms to utilise materials on site that meet those requirements including materials never becoming a waste, the DoWCOP and quality protocol.

If any materials cannot be legitimately re-used on site, they will be classified using WM3 and disposed of, either via the two on-site landfills or to an external provider. All permits and licenses will be checked and records held for any transfer or disposal.

Appendix A – Proposed Cover Thresholds

Proposed Clean Cover Thresholds		
Compound	Threshold (mg/kg unless otherwise stated)	Source
Arsenic	640	Suitable for Use Levels (S4ULs)
Beryllium	12	Suitable for Use Levels (S4ULs)
Boron	240,000	Suitable for Use Levels (S4ULs)
Cadmium	410	Suitable for Use Levels (S4ULs)
Chromium (III)	8,600	Suitable for Use Levels (S4ULs)
Chromium (VI)	33	Suitable for Use Levels (S4ULs)
Copper	68,000	Suitable for Use Levels (S4ULs)
Lead	2,300	Category 4 Screening Levels (C4SL)
Mercury	58	Suitable for Use Levels (S4ULs)
Nickel	980	Suitable for Use Levels (S4ULs)
Selenium	1,000	Suitable for Use Levels (S4ULs)
Vanadium	9,000	Suitable for Use Levels (S4ULs)
Zinc	73,000	Suitable for Use Levels (S4ULs)
Cyanide (Free)	24	SoBRA Acute Generic Assessment Criteria
Aliphatic EC ₅ -EC ₆	3,200	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aliphatic EC ₆ -EC ₈	7,800	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aliphatic EC ₈ -EC ₁₀	2,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aliphatic EC ₁₀ -EC ₁₂	9,700	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aliphatic EC ₁₂ -EC ₁₆	59,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aliphatic EC ₁₆ -EC ₃₅	1,000,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₅ -EC ₇	26,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₇ -EC ₈	56,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₈ -EC ₁₀	3,500	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₁₀ -EC ₁₂	16,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₁₂ -EC ₁₆	36,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₁₆ -EC ₂₁	28,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Aromatic EC ₂₁ -EC ₃₅	28,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Acenaphthene	84,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Acenaphthylene	83,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Anthracene	520,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Benzo[a]anthracene	170	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Benzo[a]pyrene	35	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Benzo[b]fluoranthene	44	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Benzo[ghi]perylene	3,900	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Benzo[k]fluoranthene	1,200	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Chrysene	350	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Dibenzo[ah]anthracene	3.5	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Fluoranthene	23,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Fluorene	63,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Indeno[123-cd]pyrene	500	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Naphthalene	190	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Phenanthrene	22,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Pyrene	54,000	Suitable for Use Levels (S4ULs) 1% Soil Organic Matter
Asbestos	<0.001%	Laboratory Detection Limit

