



Nant Mithil Energy Park, Powys.
PEDW DNS Application Ref: DNS CAS-01907-D7Q6Z1.

CPRW-RE-think Chapter 12:

HSE (Major Incidents)
&
Outline Construction Environmental
Management Plan (OCEMP/CEMP)

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Evidence by CPRW-RE-think on:

HSE (Major Incidents) and OCEMP (CEMP)

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1. EXECUTIVE SUMMARY:

- 1.1. The ES fails to address the Scoping Direction on Major Accidents & Disasters. It also fails to demonstrate an adequate understanding of HS&E risks, or to provide necessary skills and resources to manage them in line with legislative requirements. While there is mention of HSE management being delegated to the Principle Contractor, there is no recognition of Bute's underlying responsibilities. The various documents fail to show how HSE will be managed in a consistent and joined-up manner, and there is no recognition of Bute's ongoing responsibilities subsequent to the Construction Phase. For all the above reasons the ES is deficient and needs to be revised and updated.
- 1.2. It seems to be Bute's intent that the CEMP, as outlined by the OCEMP, will be the key document controlling project environmental management matters running from inception of detailed design (prior to contractor selection and appointment) and running throughout the construction phase. However the OCEMP does not state who will own the CEMP, what its scope will be, how it fits above or alongside other work plans, or whether it will provide for regulatory engagement (including reporting). Consequently the OCEMP is not an acceptable substitute, within the requirements of ES legislation, for a fully termed CEMP.
- 1.3. Much of the OCEMP is taken up listing elements for inclusion within the various supporting documents (Procedures, Processes, etc.). However none of these documents have yet been drafted and all aspects are subject to change. To fulfil the purpose of a statutory consultation and to constitute a valid exercise, these supporting documents should have been submitted with the ES as finalised proposals capable of due consideration.
- 1.4. The CEMP will cover only one aspect of Environmental Planning. To go from Construction to Operations will require a Commissioning activity set and it is considered that this should also be covered by the CEMP. The Operational Phase will also require a process to ensure oversight, management and reporting of all environmental aspects, activities and issues. (This is referred to here as an OEMP.) There is no reference anywhere in the ES to Operational Phase environmental actions or obligations. The Decommissioning Phase will also require a DEMP and this is provided for as a Planning Condition in the Welsh Government's model Conditions published in July 2025, but there is no reference anywhere in the ES to Decommissioning Phase environmental actions or obligations.

2. HSE AND PROJECT MANAGEMENT (CONSTRUCTION PHASE)

- 2.1. Within the ES, Health and Safety Management is only covered very briefly within Chapter 4 (Paras 4.119 to 4.121) and in App. 4.3, Page 92, Table 1.
- 2.2. Chapter 4 says that construction activities will be managed in compliance with CDM Regulations and “will not conflict with the Health and Safety at Work etc. Act 1974” (a curious phrasing).
- 2.3. There is no mention anywhere in the documentation of how Environmental Compliance and Performance will be managed during the construction phase.

NB: In the HMP, Chapter 3 (Habitat Management and Monitoring) Para 3.1.1 (Roles and Responsibilities) it is clearly stated that *“The Applicant [ie: Bute} will be responsible for meeting the commitments made in the (detailed) HMP, which will be based on the objectives and principles set out in this Outline HMP.”*
- 2.4. App. 4.3 notes that *“a Construction Phase Health and Safety Plan for the project will also be drawn up prior to construction commencing. All staff and contractors working on the construction will be required to comply with the safety procedures and work instructions outlined in the plan at all times. Risk assessments will be undertaken for all major construction activities, with measures put in place to manage any hazards identified.”* It would be normal for such a Plan to include a wide range (and a large number) of detailed Procedures, certainly covering a much wider range of activities than the very limited list of 42 Plans mentioned in the CEMP (see Appendix).
- 2.5. It might be imagined that the Construction Phase Health and Safety Plan would be a Plan authored and owned by Bute. However in the Outline CEMP App. 4.2, Paragraphs 3.6 et seq, Page 68, it specifies that all such plans will be developed specifically for this project. While in para 3.4 it states that the Principal Contractor will be responsible for implementing the CEMP, it is silent on who will specify, write and be the dutyholder for implementation of the required procedures. However it has to be assumed that all this will be in the hands of the Principal Contractor as it states that *“the Principal Contractor’s change control process will be followed to record documentation revision requests and their final approval status.”* (Para 1.13, Page 5/19). All HSE systems should have clear management structures, roles and responsibilities. The Bute documentation is deficient in leaving this unclear.
- 2.6. Table 1, Chapter 4 states that *“The purpose of the CEMP will be to: [inter alia] Provide assurance to third parties that agreed environmental performance criteria are met;”* The CEMP currently contains no measurable performance criteria, no indication of how any proposals will be presented for discussion or who they will be agreed with, and no reporting routines by which performance could be communicated if criteria existed. Furthermore *“providing reassurance”* needs to be replaced by a stronger auditable mechanism where roles and responsibilities are identified such that any failures or issues can be traced back to a root cause and future variances avoided.

Record keeping is important since responsibility for major failures (eg corporate manslaughter) cannot be delegated and will always remain the criminal responsibility of Bute's CEO and Board of Directors.

- 2.7. In regard to the Nant Mithil Project there is no reference in any of the documentation submitted to Bute's competency (or otherwise) in HSE, their resources, understanding, organisational structure, training, internal systems and procedures. While the CDM Regulations may be suitable for normal building projects, a major engineering project costing many hundreds of millions of pounds requires a deeper level of organisation and engagement.
- 2.8. In regard to Bute as a corporate entity, there is no reference to HSE anywhere on their website. Asked about this at a consultation meeting, the Bute Project Manager could not say if Bute has an HSE Policy, but if so it is not known to him. A subsequent written request to see a copy of their policy has been ignored.

3. MAJOR ACCIDENTS AND DISASTERS:

- 3.1. A Major Accident is defined as: "*An event threatening serious harm to health, welfare, or the environment, requiring external resources to manage (e.g., fatalities, widespread irreversible damage)*". In regard to Health and Safety Bute reference the Construction (Design and Management) Regulations 2015 (which will only apply to the construction phase) and the Health and Safety at Work etc. Act 1974, which will also have limited applicability. Consideration of Environmental Major Accidents and Disasters were scoped in via the Scoping Direction but Bute have (unilaterally) now scoped them out on the grounds that their proposals no longer include Solar or Battery arrays. However it is worth considering what potential "irreversible damage" the proposed development could entail as it stands. The following list is not exhaustive:
 - high levels of mortality and loss of populations of red list birds and bats;
 - groundwater pollution;
 - soil erosion from excess runoff;
 - flood risk;
 - drainage of the Great Rhos blanket bog;
 - loss of one or more GWDTEs;
 - irreparable damage to and/or loss of Long Undisturbed Soils;
 - devastating local and regional impact of noise, low frequency noise and infrasound, both on [local] communities and natural ecosystems;
 - local depopulation and collapsing communities.
- 3.2. Most of these have been touched on within the ES but then played down by Bute as being low risk and/or low impact after mitigation. It is argued that all of these have the potential to be more likely and more significant than Bute are prepared to acknowledge. Such events as these should be considered within this ES and be subject

of appropriate management strategies. Although these may not all be instantaneous events they would all qualify as Major Accidents caused by the proposed development, they would all require a response by the developer, and would all have potential consequences for the developer's senior management and shareholders, and for the regulatory bodies governing these aspects. IEMA guidance does not specify that disasters have to occur over a compressed timescale — slow burn impacts are still major, and disastrous, though arguably in the case of these foreseen risks they are not accidental.

(NB: Thalidomide was just as devastating for CIBA as Piper Alpha was for Occidental Petroleum. Opioids represent a bigger crisis for the Sackler Family than The Herald of Free Enterprise disaster did for Townsend Thoresen.)

- 3.3. It is concluded that the ES is deficient in its treatment of all three HSE elements: Health, Safety and the Environment.

4. CEMP INTRODUCTION:

- 4.1. The “*Outline Construction Environmental Management Plan*” (OCEMP) is included in the ES as App. 4.2, which runs from page 58 to page 87/160 of “[2024-12-20 - ES Vol 03 - App. 04.01 to 04.06 - Project Description Appendices.pdf](#)”. References in the following text refer to Paragraphs in App. 4.2, unless specifically stated to be from other documents. The abbreviation “ES” is used when referencing the 1112 page Written Statement of the Environmental Statement.
- 4.2. The OCEMP exists alongside several other Bute documents with which it is sometimes in conflict. There is no statement of which document has primacy or how these conflicts will be resolved. The lack of adequate contents listings and cross-referencing add to the overall confusion.
- 4.3. This submission is not at all exhaustive. It is impossible to comment on all aspects of the OCEMP without knowing its scope and how it fits alongside other documents. Once drafted, the CEMP should be made available for further consultation.

5. OCEMP / CEMP SCOPE & PURPOSE

- 5.1. The purpose of the OCEMP is stated to be a) to provide details and b) to provide assurance.
 - Since this OCEMP is only an outline plan it lacks any detail.
 - Since it is only a notional draft everything in it is subject to change.

Consequently it is impossible for the current document, as drafted, to give any assurance whatsoever. The purpose of the document remains unclear. There is a need to clarify the hierarchy of Bute's document suite, and agree the CEMP scope and contents.

5.2. It seems to be Bute's intent that the CEMP, as outlined by the OCEMP, will be the key document recording project environmental management matters running from inception of detailed design (prior to contractor selection and appointment) and throughout the construction phase. To this end it should include clear statements that:

- The CEMP will be authored, owned and controlled by Bute.
- The CEMP will be the top level document controlling all aspects of environmental management.
- The CEMP will include and address all undertakings on environmental aspects that are required by law, planning conditions, regulatory authorities, etc., or arise from best practice, etc., or are otherwise agreed as an outcome of consultation, etc..
- The CEMP will be comprehensive and all supporting policies, processes, procedures, strategies, method statements, etc. will hang off it and have seamless interfaces with it and with one another.
- The CEMP will include commissioning and, to achieve sign-off, provide a handover to operations.
- The CEMP will include a work programme (including timeline) and resourcing plan showing what staff or representatives Bute will have in place who are responsible for delivering the plan, what requests they expect to put to the regulatory (or other) authorities, and how and when these requests will be forwarded.
- The CEMP will include a process for timely reporting of progress and demonstrating compliance and/or excursions from the agreed plan.

However the OCEMP fails to cover any of these points. Consequently the OCEMP is not an acceptable substitute, within the requirements of ES legislation, for a fully termed CEMP.

5.3. While the document is directed at "stakeholders" the public has a right to be included on further consideration and oversight of the subject material. Once the CEMP has been drafted the public must be allowed a further opportunity to comment on it.

5.4. Para 1.8 states "*The detailed CEMP will be prepared during the pre-construction period leading up to appointment of a Principal Contractor. The detailed CEMP would be agreed upon with PCC and is expected to be secured by planning condition.*"

Since Planning Conditions will be stated by PEDW at the time of consent it is unclear how PCC might have any say in them. The statement should be amended to make it clear that the detailed CEMP must be finalised and signed off by PCC, and any other relevant Regulatory Authorities (e.g.: NRW), prior to any site works commencing.

5.5. The OCEMP does not specify who will write the CEMP. It says the CEMP will be prepared prior to the appointment of the Principal Contractor (PC), but also that it is a live document subject to the PC's change control process. This implies that Bute and PC can make changes, including major revisions, without reference to Powys CC (or

PEDW), despite the notion that the CEMP will form the basis of a Planning Condition. This is clearly unacceptable.

- 5.6. Since the CEMP will be written before the PC is appointed, and since the PC may be replaced during life of project, the document will need to be wholly owned and controlled by the client, Bute.
- 5.7. The CEMP would more correctly be described as the head document which should record Bute's environmental commitments to all regulatory authorities, all aspects of Bute's reporting to and consultation with them, Bute's organisational structure (including individual roles, responsibilities and accountabilities), the standards they will meet and the processes and procedures they will follow. By this means the public can have confidence that those authorities have a firm agreed basis on which to hold Bute to account.
- 5.8. The CEMP would be greatly enhanced if supported by a detailed environment work programme and schedule. This would inform Regulatory Authorities how the various activities of interest will be coordinated, when they will be undertaken, and when associated outputs will be made available, and hence how to plan their workflow.
- 5.9. The CEMP should also be explicit about completion criteria for the Construction Phase, including commissioning and the discharge of any Planning Conditions, but these are not mentioned.

6. OPERATIONAL AND DECOMMISSIONING PHASES

- 6.1. The ES does not address the Operational Phase. There is mention of maintenance requirements but these comments do not address oversight, management and reporting of all environmental aspects, activities and issues. An Operational Environmental Management Plan (OEMP) is required.
- 6.2. The Decommissioning Phase will also require a DEMP and this is provided for as a Planning Condition in the Welsh Government's model Conditions published in July 2025, but there is no reference anywhere in the ES to Decommissioning Phase environmental actions or obligations.

7. PROPOSED DEVELOPMENT

- 7.1. While the OCEMP just refers to making biodiversity enhancement “*proposals*”, does not reference the **Habitats Management Plan** and no associated activity is scheduled. The HMP should be brought within the scope of the CEMP, or at least bridged to it.
- 7.2. The language used around Footpath Management is entirely uninformative. The promised **Path Management Plan** (PaMP) needs to be based on agreed principles but for the time being these are missing. Public rights and convenience need to be safeguarded. This is a matter of public interest that should be put back out for consultation once a proposal is forthcoming.
- 7.3. The OCEMP refers to construction **fencing** being installed around the perimeter of the construction area but does not define that area or suggest a protocol to follow for its style, placement or management. A number of issues arise:
 - Bute’s purpose for fencing may not be to delineate areas “out of bounds” to their contractors but “out of bounds” to the public. If construction traffic has free access to all areas, this will allow unnecessary soil compaction and damage.
 - Trackways under construction (min.5.0m width, ref Fig 4.10) will not be wide enough to allow vehicles to pass, and vehicles will have to drive “off road” causing severe compaction and other damage around and alongside the trackways, hardstandings, cable trenches, compounds, soil storage areas, etc.
 - The CEMP should include a delineation of the areas where it is proposed to allow vehicle movements, which will thereby be simultaneously specified as requiring fences, and also as damaged areas requiring remediation.
 - The associated remediation work programme should be included.
 - Any security fencing or stock proof fencing should be planned and specified separately. The model S106 Conditions, Condition 9, published by the Welsh Government in July 2025 provides that “*...details of [fencing, etc.] shall be submitted to and approved in writing by the Local Planning Authority*” however the Conditions proposed by Bute omit this.
 - No time limit is given for the removal of temporary works. The CEMP should include firm timings, or timing trigger mechanisms.

8. RESPONSIBILITIES & MANAGEMENT

- 8.1. The Construction (Design and Management) Regulations 2015 (which the Applicant says was referenced while writing this CEMP) set out the legal duties of a client with regard to HSE, management, allocation of sufficient time and other resources, and contractor appointment and management. These Regulations require that client should “*take reasonable steps to satisfy themselves that the designer or contractor ...*” is competent to fulfil the role being contracted. This implies that client is resourced to make these judgements. However Bute has not provided any indication that it has a

supporting organisation with the systems, procedures, skills and experience to conduct any of this work in an environmentally responsible manner.

- 8.2. The roles of principal designer and principal contractor can be separate. In the Environmental Statement (ES) the Applicant references the principal contractor but never references a principal designer. It should be noted that the CEMP will already be finalised before the PC is appointed.
- 8.3. The various roles and positions outlined in Section 3 of the OCEMP appear in isolation with no indication of how they fit within Bute, whether they will be Bute employees or freelance contractors, or what internal status, delegated authority or support they will get.
- 8.4. Section 3 of the OCEMP refers to a wide range of prospective plans, not yet written, that are promised for the future. 42 of these are listed in an Appendix to this submission, but this is not an exhaustive list. Finalising these represents a very considerable amount of work, and line items are mostly described as plans, so are assumed to be site specific and so not supported by existing corporate policies or procedures. Bute has not demonstrated an understanding of the complexity of this task, and it is an open question whether they have the organisational competence to manage this work.

9. MANAGEMENT OF ENVIRONMENTAL ISSUES

- 9.1. Bute has not yet listed all areas that the CEMP will address, so the scope of this Plan is unclear.
- 9.2. The OCEMP lacks organisational clarity, e.g.: the text covers aspects of Occupational Health (such as the Dust Management Plan (DMP) and construction noise) that might be expected to be addressed via the Pollution Prevention Plan. Prior to this OCEMP being issued there should have been resolution of how and where various aspects will be addressed.
- 9.3. There is a section in Chapter 3 on “Management Planning” but it relates entirely to what it is proposed to manage rather than who will do the managing or how they will work.
- 9.4. The OCEMP does not describe the work programme required during detailed design to deliver the many environmental surveys and planning materials that are missing from the ES. This work programme will need to be integrated with regulatory oversight by relevant authorities.

ROLE OF THE ECoW (AND ACoW)

- 9.5. The ECoW will need to be in-post to coordinate the Pre-Construction Surveys and so become fully familiar with all aspects of the project that s/he will be required to supervise. The OCEMP should address these timing issues and also give details of the ECoW's role, responsibilities, accountability and signing authority. The same applies to the ACoW.
- 9.6. The ECoW and ACoW positions are likely to be very stretched. As well as doing their work at the location of excavations, etc., it seems they will also have an administrative role. Also it will be impossible for them to cover all aspects of the construction activities over such a large area covering 12 hour days, 5½ days/week for 23 continuous months. Both roles will need to be supported by a team with access to necessary resources plus the authority to control contractors if they observe compliance failures. Both roles must be authorised to communicate directly with regulatory authorities in whatever way they deem desirable or necessary without such communications being filtered by internal project management.
- 9.7. The project management team will also include others responsible for delivering other Plans; conflicts of priorities or logistical practicalities are bound to arise. Such conflicts need to be the subject of a defined and documented management process.

PRE-CONSTRUCTION SURVEYS

- 9.8. The OCEMP states: "*Not more than 12 months prior to the construction of the development, the client will engage a suitably qualified ecologist (SQE) to undertake a series of pre-construction ornithological surveys.*"

 - The SQE will need to be on-site at least a full breeding cycle prior to work commencing.
 - Hence the wording should state "*not less than 12 months prior*" rather than "*not more than 12 months prior*" (as written), or better still no time period needs to be stated but rather that construction shall not start until such surveys have produced suitable and satisfactory results (as determined by the relevant regulatory authority).

- 9.9. All the other observational and ecological planning tasks scheduled for the pre-commencement detailed design period need to be scheduled and resourced well ahead of time so that they are done thoroughly and the results can be agreed and signed off, prior to NRW licences and other permissions being sought. Only once these studies are complete and approvals given can their recommendations be incorporated into the construction environmental work programme, which itself should be finalised and agreed prior to the start of construction work on site. These considerations are also the subject of submissions on S106 Planning Conditions made in this Consultation phase.

OTHER ISSUES

9.10. As a general comment, **monitoring** is only of value if it informs subsequent action. The OCEMP frequently refers to monitoring as if it were an end in itself. A plan to monitor should specify what will be monitored, what will be measured by whom and how frequently, what represents an acceptable or unacceptable outcome, how this will be reported and to whom, and what outcomes will trigger what actions in what timeframe,

9.11. If **air quality** deteriorates the OCEMP states that "*Mitigation measures will be considered*". This is inadequate but it is representative of a lack of planning seen throughout the ES. If there is a problem which could have been foreseen (eg: dust blowing off haul roads and construction areas) it should automatically trigger immediate action (deploying a water bowser) without waiting for an instruction from the relevant manager. The thought processes behind the OCEMP section are also questionable. It is suggested that "*dust-causing activities are located away from receptors*". This idea does not survive contact with the practical reality of a worksite.

9.12. In regard to dust suppression there is a mention of having an "*adequate water supply on site*" but nowhere in the ES is there any suggestion of how this supply might be provided. It seems likely that Bute will seek an abstraction licence but this is never openly stated.

9.13. The CEMP should explicitly state that this section only refers to construction **noise** and does not consider commissioning and any noise (including infrasound) coming from turbines during commissioning or operations. If the intent is that turbine noise should also be included then further considerations apply. The requirement for setting turbine noise limits is covered in separate submissions.

9.14. Good **liaison and communication with local communities**, properties and businesses is essential. Regionally Bute has demonstrated an assertive and uncompromising approach to community relations, and there is no goodwill remaining. Criteria and mechanisms for Community Liaison should be agreed with the communities affected and structured as a binding commitment within the CEMP.

LANDSCAPE & VISUAL

9.15. Paragraph 4.8 states: "*The CEMP and SMP will also set out restoration of landscape earthworks, soils and surface vegetation once the construction phase is complete.*" However Table 4.4 of the ES presents the "*Indicative construction programme*" which shows all reinstatement happening in months 20, 21 and 22 of the 23 month construction period. There is no reason why restoration and remediation cannot follow on in the immediate vicinity of each construction element promptly as soon as other groundworks allow. It has already been specified by NRW that drainage construction must be integrated with other work so there will never be a period when

runoff is uncontrolled. Hence as soon as constructed elements are functionally complete there should be no reason for vehicles etc. to stray off the constructed surfaces and therefore no reason why they cannot be remediated or reinstated immediately. This has the advantage that soils can be taken from stockpiles early so as to retain as much of their ecological value as possible, and before the seeds within them become unviable.

- 9.16. Also the CEMP and SMP need to set out not just details of **what** is intended to be done but also **how** this work will be done and any ecological or weather-related controls on **when** it can be done. No mention is made about the time period required for groundworks to be completed. In terms of visual amenity there is a particular concern that large cut banks or fill aprons will be visible as scars on the landscape from a considerable distance. The CEMP should also set out how these features will be reinstated to minimise this impact in terms of both scale and duration.

CULTURAL HERITAGE

- 9.17. Historic and cultural elements have survived to date despite public access but will need to be protected from the developer. When the fencing plan is drawn up it should be informed by the ACoW and by preliminary investigations, and subsequently should be revised as may be required by the ACoW as investigative results unfold.

PEAT & GROUND CONDITIONS AND HYDROLOGY, HYDROGEOLOGY & FLOOD RISK

- 9.18. To avoid duplication, the OCEMP sections on Peat & Ground Conditions and Hydrology, Hydrogeology and Flood Risk are covered by other submissions made in parallel to this.

10. CONCLUSIONS

1. The ES fails to address the Scoping Direction on Major Accidents & Disasters. It also fails to provide an acceptable basis for HSE management of the proposed development. On multiple grounds the ES is deficient and needs to be revised and updated.
2. The purpose and scope of the CEMP is not set out.
3. As a consequence it is unclear how environmental obligations will be managed during the Construction phase.
4. Environmental management of the Operations and Decommissioning phases should also be covered but this is not mentioned.
5. There is no line of sight to Bute's senior management in order to demonstrate they recognise their legal responsibilities and duties.
6. There is a vast amount of work needed to bring this planning activity set to maturity but no programme for this or indication that Bute recognise this.
7. Updated proposals (including a fully termed CEMP) should be put back out for public and regulatory authority consultation prior to being reconsidered by PEDW.

APPENDIX 1: PLANS AND MEASURES YET TO BE DEVELOPED

The OCEMP identifies the following plans, etc. which will be required in support, namely:

- Site Waste Management Plan (SWMP);
- Surface Water Management Plan (Construction Phase SuWMP) (to include an Outline Drainage Strategy) (*see comments elsewhere on Chapter 11*);
- Pollution Prevention Plan (PPP) (*see comments elsewhere on Chapter 11*);
- Pollution risk assessment, and other elements to be included in the SuWMP;
- Best practice measures to prevent and deal with spills and discharges;
- Best Practicable Means (BPM) (potentially part of the PPP);
- Emergency Procedures (to include emergency pollution control measures) but it is entirely unclear how this differs from the Emergency Response Plan (ERP);
- Construction Traffic Management Plan (CTMP) (to include a Transport Management Plan (TMP) for Abnormal Indivisible Loads (AILs));
- Soil Management Plan (SMP) (currently an OSMP) (*see comments elsewhere on Chapter 11*);
- Details of peat re-use, storage & remediation;
- Site Restoration Plan (SRP);
- Foul Drainage Strategy (*see comments elsewhere on Chapter 11: Geology, Hydrogeology & Hydrology*);
- Borrow Pit Restoration Plan (BPRP) (currently an OBPRP) (*see comments elsewhere on Chapter 11*);
- Decommissioning Plan (currently an Outline Decommissioning Plan);
- Method Statements (including a Biosecurity Method Statement and an Invasive Species Management Plan);
- Biosecurity risk assessment;
- Dust Management Plan (DMP);
- Other compliance activities identified in paragraph 4.3;
- Construction Mitigation Measures;
- Ecology and Biodiversity – identification of current industry good practice for construction;
- Roles and Responsibilities for ECoW and SQE;
- Work plan for further ornithological surveys and breeding surveys;
- Species Protection Plan(s) (SPPs);
- Aquatic species mitigation plan;
- A full watercourse crossing design;
- Habitat Management Plan (HMP);
- Programme of archaeological work;
- Role and Responsibility for ACoW;
- Written Scheme of Investigation (WSI);
- A Level 3 landscape survey record + submission of an ordered archive (including drawings);

- A report on the results of the archaeological recording + submission of an ordered archive;
- Pre-construction ground investigation works including consideration of potential residual contamination;
- Geotechnical Risk Register;
- Programme of geotechnical visual observation to be undertaken by the site construction team;
- Pre-works survey across UXO areas;
- Construction of a hydrogeological conceptual model for groundwater connectivity;
- Water Quality Monitoring Plan (WQMP);
- Establishment of a Project Website;
- Pre-construction condition survey of local roads and the A11 route;
- Abnormal Load Transport Management Plan (TMP);
- Path Management Plan (PaMP);
- Staff Travel Plan.

This list is not exhaustive. There are other necessary plans not mentioned in the OCEMP (such as a Fencing Plan).

Many of these plans, etc., should rightly, under ES legislation, have been completed and included in the ES. At the very least the ES should have included a comprehensive list of all areas requiring compliance processes and a timeline showing when these elements are to be completed, agreed and approved where necessary, and in due course be available to support contractor selection, induction and the scheduling of site works.

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